Supreme Court, U.S.
FILED
AUG 15 2003
OFFICE OF THE CLERK

Appeal Docketed May 15, 2003
Probable Jurisdiction Noted June 5, 2003

No. 02-1674 *et al.*

IN THE

Supreme Court of the United States

MITCH MCCONNELL *et al.*,

Appellants,

v.

FEDERAL ELECTION COMMISSION *et al.*,

Appellees.

On Appeal From The United States District Court For The District of Columbia

JOINT APPENDIX

VOLUME II (Pages 465 to 952)

FLOYD ABRAMS
SUSAN BUCKLEY
BRIAN MARKLEY
CAHILL GORDON & REINDEL LLP
80 Pine Street
New York, NY 10005
(212) 701-3000

KENNETH W. STARR
Counsel of Record
EDWARD W. WARREN
KANNON K. SHANMUGAM
KIRKLAND & ELLIS
655 Fifteenth Street, N.W.
Washington, DC 20005
(202) 879-5000

(*additional counsel on inside cover*)

August 2003

WILSON-EPES PRINTING CO., INC. – (202) 789-0096 – WASHINGTON, D. C. 20001

KATHLEEN M. SULLIVAN
559 Nathan Abbott Way
Stanford, CA 94305
(650) 725-9875

JAN WITOLD BARAN
THOMAS W. KIRBY
LEE E. GOODMAN
WILEY, REIN & FIELDING LLP
1776 K Street, N.W.
Washington, DC 20006
(202) 719-7000

VALLE SIMMS DUTCHER
L. LYNN HOGUE
SOUTHEASTERN LEGAL FOUNDATION, INC.
3340 Peachtree Road, N.E.
Suite 3515
Atlanta, GA 30326
(404) 365-8500

G. HUNTER BATES
Frost Brown Todd LLC
400 West Market Street, Suite 3200
Louisville, KY 40202-3363
(502) 568-0222

Counsel in No. 02-1674

TABLE OF CONTENTS

VOLUME I

Declarations & Affidavits

Andrews, Wright 1

Ayres, Q. Whitfield 9

Ayres, Q. Whitfield - Rebuttal 17

Bailey, Douglas 24

Banning, Jay 30

Bloom, Elaine 47
- Exh. 3 56
- Exh. 4 68
- Exh. 5 73
- Exh. 6 93
- Exh. 7 97

Boos, Michael (p. 4-13) 102

Bowler, Kathleen 114

Bowler, Kathleen – Rebuttal 160

Brock, William E. 169

Bumpers, Dale 172

Dasbach, Stephen et al 181

Duncan, Robert 203

Echols, Emily 212

Echols, Tim 217

Erwin, Ryan 223

Fowler, Donald 261

Gallagher, Mary Jane 265

Greenwald, Gerald 281

Huard, Paul (pp. 1-2) 285

Josefiak, Thomas 289

Josefiak Rebuttal 322

Josten, R. Bruce (pp. 1-3) 327

Keating, David (11) 333

Knopp, Janice L. 334

Kolb, Charles E.M. (Exh. 6) 348

LaPierre, Wayne (NRA App. 1-26) 364

McCain, John 389

McConnell, Mitch 401

McDow, Donna 406

McDow, Hanna 408

McDow, Isaac 412

McQueen, Angus (NRA App. 35-40) 416

Mitchell, Denise 423

VOLUME II

Denise Mitchell, Exh. 1 464

Mitchell, Jessica 582

Mitchell, Pamela 588

Monroe, Edward (pp.1-3) 591

Morgan, Timothy 595

Murphy, Laura 608
Exh. A 615
Exh. B 618
Exh. C 620

O'Steen, David N. 628

Pence, Michael 662

Pennington, Rocky 668
Exh. 4 678
Exh. 5 685

Peschong, John 693

Pratt, Lawrence (19-22) 702

Pryor, William H. 705

Randlett, Wade 712

Romero, Anthony 718

Rosenthal, Steven 723
Exh. 4 737
Exh. 10 738

Rudman, Warren 740

Sandherr, Stephen 747

Shays, Christopher (NRA App. 101) 749

Shea, Beverly 750

Shea, Gerald 773
Exh. 31 800

Simon, Paul 802

Simpson, Alan K. 808

Smith, Curt 813

Solid, Bonnie 817

Solid, Daniel 819

Stoltz, Gail 823

White, Cynthia 829

White, Zachary 831

Depositions

Andrews - 16-35 836
49-50 846
59-69 846

Feingold - 41 852
132-33 853
189 854
243 856

260 857
264-65 858

Goldstein - 182 860

Green Cross-x - 24 861
58-61 861
69-72 864
142 867
148-49 868
158 870
Ex. 12 871

Herrnson - 208-09 877

Hiatt - 102 878
104 878

Hickmott - 9-27 880

Hilliard - 68 890
86 891
88 891
90 892
95 893
103 894

Holman - 42-43 895
73 896
77-78 896

Huard - 86-87 899
90 901

Jeffords - 6-29 902
75-77 914

	83-85	916
	106-07	918
Josten -	175-76	920
LaPierre	Exh. 3 (¶¶ 1-11, 17, 27-33, 47-52, Signature)	922
Lupia -	17	926
Mann Cross-x -	148-49	927
	164-65	928
McCain -	15-16	930
	89	931
	94-101	933
	121-27	936
	139	941
	141	942
	192-93	943
	205-15	944
	223	952

VOLUME IH

McConnell -	12-19	953
McLoughlin -	23	959
McQueen -	113-30	960
Meehan -	51-54	971
	124	973
	128	974
	171-72	974
	218-19	975
Oliver -	46-57	977
	106	985

Seltz -	187	986
Shapiro Cross-x -	114-17	987
Shays -	40-43	991
	111	994
	128	995
Shays Cross-x -	10-21	996
	65	1005
Shields -	58-63	1007
Simpson -	11-16	1010
	22-31	1013
	39-43	1019
	50-53	1022
Snowe -	159-60	1025
	205-08	1026
	231-32	1028
Strother -	18-20	1031
	39-40	1032
	139-148	1032
	223-24	1037
Strother Cross-x -	38-39	1038
Thompson -	68	1039
	87	1040
Williams Cross-x -	21-22	1041
	56-59	1042

Expert Reports

Gibson (1 PCS/ ER 1-66)		1046

Gibson Rebuttal (2 PCS/ ER 794-821).....1115

Gibson Supplemental (2 PCS/ ER 831-37).....1144

Goldstein 1150

Green 1188

Green Rebuttal 1235

Keller.....1241

Krasno & Sorauf.....1272

VOLUME IV

La Raja 1406

La Raja Rebuttal.....1459

Lott 1473

Magleby - 1, 5-6, 10, 18-23, 26-33, 35-45 1476

Mann -1-26 1534

Mann Declaration.....1561

Mellman/ Wirthlin - 1, 5-12 1563

Milkis.....1572

Milkis Rebuttal.....1610

Snyder.....1623

Pleadings and Orders

4/24/2002 - Order (Docket #24).....1655

4/24/2002 - Order (Docket #25).....1659

5/13/2002 - Order (Docket #49).....1661

6/17/2002 – Responses and Objections of Defendant FEC to First Interrogatories by the Echols Plaintiffs.....1665

6/17/2002 – Response and Objections of the Attorney General to the Echols' Plaintiffs' First Set of Interrogatories 1675

7/26/2002 - Order (Docket #113).....1691

9/5/2002 – Intervenors' Responses to Plaintiffs California Democratic Party and California Republican Party's First Set of Requests for Admissions, Interrogatory, and Request for Production of Documents.....1694

9/16/2002 - FEC Response to Requests for Admissions Nos. 1, 2, 23, 24, 101-13 1732

9/16/2002 - Intervenors' Responses to Contention Interrogatories (Adams Exh. 15).....1736

9/16/2002 – Objections and Responses of Defendant FEC to the First Requests for Admission by Plaintiff Emily Echols, et al. 1752

9/16/2002 – Responses of Defendant United States to Plaintiffs' Requests to Admit, Supplemental Interrogatory and Request to Produce to All Defendants.....1775

9/19/2002 - US Response to RNC's 2nd Set of Interrogatories to Defendants, at 4 1800

10/15/2002 - Order (Docket #175).....1802

11/15/2002 - Order (Docket #218).....1807

11/26/2002 - Order (Docket #239).....1809

5/9/2003 ACLU Motion for Stay 1812

5/9/2003 Declaration of Anthony Romero in Support of ACLU Motion for Stay.....1816

VOLUME V

Other Documents

FEC, Twenty Year Report, Ch. 3, p. 4 (April 1995).....1820

Statement of Commissioner B. Smith in FEC MUR 4624 (Nov. 6, 2001) 1822

Echols Exhibits 30-39 (FEC Annual Reports 1992 – 2000).....1868

RNC Exhibit 1 1878
RNC Exhibit 232.....1926
RNC Exhibit 292.....1929

T. Edsall & D. VonDrehle, *Republicans Have Huge Edge in Campaign Cash,* Wash. Post, Feb. 14, 2003 1931

T. Edsall, *Liberals Meeting to Set '04 Strategy; Labor, Rights Groups Focus on Getting Out the Vote to Help Democrats*, Wash. Post, May 25, 2003 1938

H. Meyerson, *Union Dos and Don'ts For the Democrats*, Wash. Post, May 28, 2003.....1942

BNA, Money & Politics Report (June 24, 2003) 1946

NRA Bylaws (NRA App 106).....1948

NRA Fundraising Materials (NRA App. 133-36).....1950

Annenberg Center Study - 7 (NRA App. 197), 27-28....1957

Summary of NRA's Gross Revenues.....1963

Summary of Returns on NRA Infomercials (NRA App. 199).....1964

Summary of Airings of NRA Infomercials from Jan. - Dec. 2000)(NRA App. 107).....1965

Summary of "Airings" of California News Magazine (NRA App. 216).....1966

Intervenors' Comments to FEC re "Electioneering Communications" - 3, 10-11 (NRA App. 209-10).....1967

Storyboards of Political Ads Attacking NRA (NRA App. 226-232) 1969

L. de Moraes, *Political "Reality": Viewers to Pick 2004 Candidate*, Wash. Post, 9/21/02 (NRA App. 343-45)....1982

Internet Doubles Claim New Survey Fraud Warnings Made, Internet Bus. News, 7/1/98 (NRA App. 352).....1987

The Pew Research Center, *Internet Sapping a Broadcast News Audience*, 6/11/02 (NRA App. 444-45).....1989

T. Putnam, *The G.E. Boycott: A Story NBC Wouldn't Buy*, Extra!, Jan./Feb. 1991 (NRA App. 687-89) 1993

C. Lewis, *Media Money: How Corporate Spending Blocked Ad Reform and Other Stores of Influence*, Columbia Journalism Review (NRA App. 697-97).....1997

The Pew Research Center for the People and the Press, *Self Censorship: How Often and Why*, Apr. 30, 2000 (NRA App. 862-864) 2000

Transcript of "Brady Bill" (NRA App. 885).....2005

Transcript of "Crime Bill" (NRA App. 886-88).....2006

Transcript of "California" (NRA App. 892-904).....2010

Transcript of President Clinton Appearance on Today Show (NRA App. 905-10).....2034

Transcript of "It Can't Happen Here" 2046

Transcript of "MMM Prosecution" 2070

Transcript of "Tribute" (NRA App. 943-47).....2086

Summary of NRA News Magazines 2096

Transcript of "The Truth About Prosecution" (NRA App. 978-84) 2102

NRA News Magazine Budget Recap 2115

Adams Exh. 6 :Memoranda from Bush Pioneer Thomas R. Kuhn 2116

Adams, Exh 34: Jim Abrams, *Senate Takes Up Rival to McCain-Feingold Spending Limits*, AP Mar. 27, 2001 2121

MMc 0095 2125

Huard Deposition Exhibit 4.....2127

Huard Deposition Exhibit 18.....2131

VOLUME VI

DOCUMENTS UNDER SEAL

Strother Declaration 2146

Huard Deposition Exhibits
2 2153
6B 2159
7 2166

Mitchell Deposition Exhibits
6 2169
7 2172
9 (pp. AFL 1582-86) 2174
10 2178

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	Director	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast w/in No... 30 Days of Primary?	60 Days of General Election?
"Cuts"	Generic		☐	Budget Priorities; Health & Safety	"Stand with us--we're the men and women of the AFL-CIO, leading th fight for America's working families." *"Call your Representative -- [800-number]"*	4/10/95-4/23/95		1995	☐	☐
"A Thousand Cuts"	Generic		☐	Budget Priorities; Health & Safety	"Stand with us--we're the men and women of the AFL-CIO, leading th fight for America's working families" *[800-number]*	4/10/95-4/23/95		1995	☐	☐
"Cuts"	AR-04	Jay Dickey	☐	Budget Priorities; Health & Safety	"Stand with us--we're the men and women of the AFL-CIO, leading th fight for America's working families." *"Call Rep. Jay Dickey -- [800-number]"*	4/10/95-4/23/95	1995	1995	☐	☐
"Cuts"	KY-01	Edward Whitfield	☐	Budget Priorities; Health & Safety	"Stand with us--we're the men and women of the AFL-CIO, leading th fight for America's working families." *"Call Rep. Edward Whitfield -- [800-number]"*	4/10/95-4/23/95	1995	1995	☐	☐
"Cuts"	PA-05	Bill Clinger	☐	Budget Priorities; Health & Safety	"Stand with us--we're the men and women of the AFL-CIO, leading th fight for America's working families." *"Call Rep. Bill Clinger -- [800-number]"*	4/10/95-4/23/95	1995	1995	☐	☐
"Cuts"	OH-10 OH-19	Steve Latourette & Martin Hoke	☐	Budget Priorities; Health & Safety	"Stand with us--we're the men and women of the AFL-CIO, leading th fight for America's working families." *"Call Rep. Steven Latourette and Rep. Martin Hoke -- [800-number]"*	4/10/95-4/23/95	1995	1995	☐	☐
"Cuts"	PA-04	Fred Heineman	☐	Budget Priorities; Health & Safety	"Stand with us--we're the men and women of the AFL-CIO, leading th fight for America's working families." *"Call Rep. Fred Heineman -- [800-number]"*	4/10/95-4/23/95	1995	1995	☐	☐
"Cuts"	PA-21 PA-05	Phil English & Bill Clinger	☐	Budget Priorities; Health & Safety	"Stand with us--we're the men and women of the AFL-CIO, leading th fight for America's working families." *"Call Rep. Phil English and Rep. Bill Clinger -- [800-number]"*	4/10/95-4/23/95	1995	1995	☐	☐
"Sparkle"	TX-06	Steve Stockman	☐	Budget Priorities; Education Funding; Medicare Funding; Health & Safety; Tax Fairness	"Ask Congress to make America the land of opportunity again, to keep the American Dream alive, to stand up for America's working families. *"Call Rep. Stockman -- [800-number]"*	7/95	1995	1996	☐	☐

MITCHELL EXHIBIT 1

EDITOR'S NOTE

THE FOLLOWING PAGES WERE POOR HARD COPY AT THE TIME OF FILMING. IF AND WHEN A BETTER COPY CAN BE OBTAINED, A NEW FICHE WILL BE ISSUED.

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate: Named in normal type; Pictured in italic type	Radio?	Issue(s) Discussed	Call to Action: Audio in normal type; Video in italic type	Dates: Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"Sparkler"	GA-07	Bob Barr & John Linder	☑	Budget Priorities; Medicare Funding; Education Funding; Health & Safety; Tax Fairness	"Call 1-800..., Tell Congressmen Bob Barr and John Linder to keep alive the promise of America."	7/95	1996	1996	☐	☐
"Sparkler"	OK-02	Tom Coburn	☐	Budget Priorities; Education Funding; Medicare Funding; Health & Safety; Tax Fairness	"Ask Congress to make America the land of opportunity again, to keep the American Dream alive, to stand up for America's working families. "Call Rep. Coburn – [800-number]"	7/95	1996	1996	☐	☐
"Sparkler"	MA-08	Peter Torkildsen	☑	Education Funding; Medicare Funding; Health & Safety; Tax Fairness	"Ask Congress to make America the land of opportunity again, to keep the American Dream alive, to stand up for America's working families.	7/95	1996	1996	☐	☐
"Sparkler"	Generic (Rightsize r)		☑	Budget Priorities; Medicare Funding; Education Funding; Health & Safety; Tax Fairness	"Call [800-number] tell Congress to stand up for America's working families"	7/95	1996	1996	☐	☐
"Sparkler"	IL-06	Michael Flanagan	☑	Education Funding; Medicare Funding; Health & Safety; Tax Fairness	"Ask Congress to make America the land of opportunity again, to keep the American Dream alive, to stand up for America's working families	7/95	1996	1996	☐	☐
"Sparkler"	CT-05	Gary Franks	☑	Education Funding; Medicare Funding; Health & Safety; Tax Fairness	"Ask Congress to make America the land of opportunity again, to keep the American Dream alive, to stand up for America's working families.	7/95	1996	1996	☐	☐
"Sparkler"	NC-04	Fred Heineman	☑	Education Funding; Medicare Funding; Health & Safety; Tax Fairness	"Ask Congress to make America the land of opportunity again, to keep the American Dream alive, to stand up for America's working families.	7/95	1996	1996	☐	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate: Named in normal type; Pictured in italic type	Radio?	Issue(s) Discussed	Call to Action: Audio in normal type; Video in italic type	Dates: Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"Sparkler"	Generic		☐	Budget Priorities; Education Funding; Medicare Funding; Health & Safety; Tax Fairness	"Ask Congress to make America the land of opportunity again, to keep the American Dream alive, to stand up for America's working families. "Call Congress – [800-number]"	7/95		1996	☐	☐
"Sparkler"	IL-16	Ray Lahood	☑	Education Funding; Medicare Funding; Health & Safety; Tax Fairness	"Ask Congress to make America the land of opportunity again, to keep the American Dream alive, to stand up for America's working families.	7/95	1996	1996	☐	☐
"Sparkler"	IN-08	John Hostettler	☐	Budget Priorities; Education Funding; Medicare Funding; Health & Safety; Tax Fairness	"Ask Congress to make America the land of opportunity again, to keep the American Dream alive, to stand up for America's working families. "Call Rep. Hostettler – [800-number]"	7/95	1996	1996	☐	☐
"Sparkler"	TN-08	Zach Wamp	☐	Budget Priorities; Education Funding; Medicare Funding; Health & Safety; Tax Fairness	"Ask Congress to make America the land of opportunity again, to keep the American Dream alive, to stand up for America's working families. "Call Rep. Wamp – [800-number]"	7/95	1996	1996	☐	☐
"Sparkler"	CA-01	Frank Riggs	☐	Budget Priorities; Education Funding; Medicare Funding; Health & Safety; Tax Fairness	"Ask Congress to make America the land of opportunity again, to keep the American Dream alive, to stand up for America's working families. "Call Rep. Riggs – [800-number]"	7/95	1996	1996	☐	☐
"Sparkler"	WY-AL	Barbara Cubin	☐	Budget Priorities; Education Funding; Medicare Funding; Health & Safety; Tax Fairness	"Ask Congress to make America the land of opportunity again, to keep the American Dream alive, to stand up for America's working families. "Call Rep. Cubin – [800-number]"	7/95	1996	1996	☐	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type Pictured in *italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type Video in *italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Stand"	AR-04	Rep. Jay Dickey	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressman Dickey to stop attacking America's working families"	8/21/95-9/4/95	1996	1996	☐	☐
		Newt Gingrich			*"Call Rep. Dickey [800-number]"*					
"Grab"	AR-04	Rep. Jay Dickey	☐	Health & Safety	"Tell Republican Congressman Dickey to stop cutting health and safety so other families don't lose their loved ones." *"Call Rep. Dickey – [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Grab"	KY-01	Rep. Edward Whitfield	☐	Health & Safety	"Tell Republican Congressman Whitfield to stop cutting health and safety so other families don't lose their loved ones." *"Call Rep. Whitfield – [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Grab"	TN-06 TN-04	Rep. Zach Wamp & Van Hilleary	☐	Health & Safety	"Tell Republican Congressman Wamp and Hilleary to stop cutting health and safety so other families don't lose their loved ones." *"Call Rep. Wamp and Hilleary – [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Grab"	OH-05	Frank Cremeans	☐	Health & Safety	"Tell Republican Congressman Cremeans to stop cutting health and safety so other families don't lose their loved ones." *"Call Rep. Cremeans – [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Stand"	UT-02	Rep. Enid Greene Waldholtz	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congresswoman Waldholtz to stop attacking America's working families"	8/21/95-9/4/95	1996	1996	☐	☐
		Newt Gingrich			*"Call Rep. Waldholtz [800-number]"*					
"Grab"	UT-02	Rep. Enid Greene Waldholtz	☐	Health & Safety	"Tell Republican Congresswoman Waldholtz to stop cutting health an safety so other families don't lose their loved ones." *"Call Rep. Waldholtz – [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Stand"	WI-01	Mark Neumann	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressman Neumann to stop attacking America's working families"	8/21/95-9/4/95	1996	1996	☐	☐
		Newt Gingrich			*"Call Rep. Neumann [800-number]"*					

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type Pictured in *italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type Video in *italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Sputter"	NY-27	Bill Paxon	☑	Education Funding; Medicare Funding; Health & Safety; Tax Fairness	"Tell Congress to make America the land of opportunity again, to love the American Dream alive, to stand up for America's working families.	7/95	1996	1996	☐	☐
"Sputter"	OH-05	Frank Cremeans	☑	Education Funding; Medicare Funding; Health & Safety; Tax Fairness	"Tell Congress to make America the land of opportunity again, to love the American Dream alive, to stand up for America's working families.	7/95	1996	1996	☐	☐
"Sputter"	OR-05	Jim Bunn	☑	Education Funding; Medicare Funding; Health & Safety; Tax Fairness	"Tell Congress to make America the land of opportunity again, to love the American Dream alive, to stand up for America's working families.	7/95	1996	1996	☐	☐
"Sputter"	PA-13	John Fox	☑	Education Funding; Medicare Funding; Health & Safety; Tax Fairness	"Tell Congress to make America the land of opportunity again, to love the American Dream alive, to stand up for America's working families.	7/95	1996	1996	☐	☐
"Sputter"	WA-01 WA-09	Rick White & Randy Tate	☑	Education Funding; Medicare Funding; Health & Safety; Tax Fairness	"Tell Congress to make America the land of opportunity again, to love the American Dream alive, to stand up for America's working families.	7/95	1996	1996	☐	☐
"Sputter"	NY-01	John Ensign	☑	Education Funding; Medicare Funding; Health & Safety; Tax Fairness	"Tell Congress to make America the land of opportunity again, to love the American Dream alive, to stand up for America's working families.	7/95	1996	1996	☐	☐
"Grab"	WI-01	Mark Neumann	☐	Health & Safety	"Tell Republican Congressman Neumann to stop cutting health and safety so other families don't lose their loved ones." *"Call Rep. Neumann – [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type Pictured in italic type	Radio?	Issue(s) Discussed	Call to Action Audio in normal type Video in italic type	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Dole"	TX-09	Steve Stockman	☐	Health & Safety	"Tell Republican Congressman Stockman to stop cutting health and safety so other families don't lose their loved ones." *"Call Rep. Stockman – [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Gore"	TX-09	Steve Stockman *Newt Gingrich*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressman Stockman to stop attacking America's working families" *"Call Rep. Stockman [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Dole"	OH-12	John Kasich	☐	Health & Safety	"Tell Republican Congressman Kasich to stop cutting health and safety so other families don't lose their loved ones." *"Call Rep. Kasich – [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Gore"	OH-12	John Kasich *Newt Gingrich*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressman Kasich to stop attacking America's working families" *"Call Rep. Kasich [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Dole"	OH-10 OH-10	Steve LaTourette & Martin Hoke	☐	Health & Safety	"Tell Republican Congressmen LaTourette and Hoke to stop cutting health and safety so other families don't lose their loved ones." *"Call Rep. LaTourette and Hoke – [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Gore"	CA-02	Andrew Breitbart *Newt Gingrich*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressmen Breitbart to stop attacking America's working families" *"Call Rep. Breitbart [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Gore"	NY-01	John Boehlert *Newt Gingrich*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressman Boehlert to stop attacking America's working families" *"Call Rep. Boehlert [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Gore"	OH-02	Tom Coburn *Newt Gingrich*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressman Coburn to stop attacking America's working families" *"Call Rep. Coburn [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type Pictured in italic type	Radio?	Issue(s) Discussed	Call to Action Audio in normal type Video in italic type	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Gore"	PA-21	Rep. Phil English *Newt Gingrich*	☐	Budget Priorities; Education Funding; Medicare Funding; Health & Safety; Tax Fairness	"Tell Congressman English to stop attacking America's working families" *"Call Rep. English [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Dole"	OK-02	Tom Coburn	☐	Health & Safety	"Tell Republican Congressman Coburn to stop cutting health and safety so other families don't lose their loved ones." *"Call Rep. Coburn – [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Gore"	TX-14	Greg Laughlin *Newt Gingrich*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressman Laughlin to stop attacking America's working families" *"Call Rep. Laughlin [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Dole"	TX-14	Greg Laughlin	☐	Health & Safety	"Tell Republican Congressman Laughlin to stop cutting health and safety so other families don't lose their loved ones." *"Call Rep. Laughlin – [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Dole"	IN-08	John Hostettler	☐	Health & Safety	"Tell Republican Congressman Hostettler to stop cutting health and safety so other families don't lose their loved ones." *"Call Rep. Hostettler – [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Gore"	IN-08	John Hostettler *Newt Gingrich*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressman Hostettler to stop attacking America's working families" *"Call Rep. Hostettler [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Gore"	ID-01	Helen Chenoweth	☐	Health & Safety	"Tell Republican Congresswoman Chenoweth to stop cutting health and safety so other families don't lose their loved ones." *"Call Rep. Chenoweth – [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Gore"	ID-01	Helen Chenoweth *Newt Gingrich*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congresswoman Chenoweth to stop attacking America's working families" *"Call Rep. Chenoweth [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 days of the Election?
"Sputnik"	Generic		☐	Budget Priorities; Education Funding; Medicare Funding; Health & Safety; Tax Fairness	"Ask Congress to make America the land of opportunity again, to lose the American Dream alive, to stand up for America's working families *"Call Congress – [800-number]"*	7/95		1996	☐	☐
"Sputnik"	IL-16	Ray Lahood	☑	Education Funding; Medicare Funding; Health & Safety; Tax Fairness	"Ask Congress to make America the land of opportunity again, to lose the American Dream alive, to stand up for America's working families.	7/95	1996	1996	☐	☐
"Sputnik"	IN-08	John Hostettler	☐	Budget Priorities; Education Funding; Medicare Funding; Health & Safety; Tax Fairness	"Ask Congress to make America the land of opportunity again, to lose the American Dream alive, to stand up for America's working families. *"Call Rep. Hostettler – [800-number]"*	7/95	1996	1996	☐	☐
"Sputnik"	TN-03	Zach Wamp	☐	Budget Priorities; Education Funding; Medicare Funding; Health & Safety; Tax Fairness	"Ask Congress to make America the land of opportunity again, to lose the American Dream alive, to stand up for America's working families. *"Call Rep. Wamp – [800-number]"*	7/95	1996	1996	☐	☐
"Sputnik"	CA-01	Frank Riggs	☐	Budget Priorities; Education Funding; Medicare Funding; Health & Safety; Tax Fairness	"Ask Congress to make America the land of opportunity again, to lose the American Dream alive, to stand up for America's working families. *"Call Rep. Riggs – [800-number]"*	7/95	1996	1996	☐	☐
"Sputnik"	WY-AL	Barbara Cubin	☐	Budget Priorities; Education Funding; Medicare Funding; Health & Safety; Tax Fairness	"Ask Congress to make America the land of opportunity again, to lose the American Dream alive, to stand up for America's working families. *"Call Rep. Cubin – [800-number]"*	7/95	1996	1996	☐	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 days of the Election?
"Goals"	MI-08	Dick Chrysler	☐	Health & Safety	"Tell Republican Congressmen Chrysler to stop cutting health and safety so other families don't lose their loved ones." *"Call Rep. Chrysler – [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Sword"	MI-08	Dick Chrysler *Newt Gingrich*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressman Chrysler to stop attacking America's working families" *"Call Rep. Chrysler [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Goals"	OR-05	Jim Bunn	☐	Health & Safety	"Tell Republican Congressman Bunn to stop cutting health and safety so other families don't lose their loved ones." *"Call Rep. Bunn – [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Sword"	OR-05	Jim Bunn *Newt Gingrich*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressman Bunn to stop attacking America's working families *"Call Rep. Bunn [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Sword"	KY-01	Rep. Edward Whitfield *Newt Gingrich*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressman Whitfield to stop attacking America's working families" *"Call Rep. Whitfield [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Sword"	OH-05	Frank Cremeens *Newt Gingrich*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressman Cremeens to stop attacking America's working families" *"Call Rep. Cremeens [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Sword"	OH-10 OH-18	Steve LaTourette & Martin Hoke *Newt Gingrich*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressman LaTourette and Hoke to stop attacking America's working families" *"Call Rep. LaTourette and Hoke [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Goals"	IA-04	Greg Ganske	☐	Health & Safety	"Tell Republican Congressmen Ganske to stop cutting health and safety so other families don't lose their loved ones." *"Call Rep. Ganske – [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"Sparkler"	NY-27	Bill Paxon	☑	Education Funding; Medicare Funding; Health & Safety; Tax Fairness	"Ask Congress to make America the land of opportunity again, to keep the American Dream alive, to stand up for America's working families.	7/95	1996	1996	☐	☐
"Sparkler"	OH-08	Frank Cremeans	☑	Education Funding; Medicare Funding; Health & Safety; Tax Fairness	"Ask Congress to make America the land of opportunity again, to keep the American Dream alive, to stand up for America's working families.	7/95	1996	1996	☐	☐
"Sparkler"	OR-05	Jim Bunn	☑	Education Funding; Medicare Funding; Health & Safety; Tax Fairness	"Ask Congress to make America the land of opportunity a[illegible], to keep the American Dream alive, to stand up for America's working families.	7/95	1996	1996	☐	☐
"Sparkler"	PA-13	John Fox	☑	Education Funding; Medicare Funding; Health & Safety; Tax Fairness	"Ask Congress to make America the land of opportunity again, to keep the American Dream alive, to stand up for America's working families.	7/95	1996	1996	☐	☐
"Sparkler"	WA-01 WA-09	Rick White & Randy Tate	☑	Education Funding; Medicare Funding; Health & Safety; Tax Fairness	"Ask Congress to make America the land of opportunity again, to keep the American Dream alive, to stand up for America's working families.	7/95	1996	1996	☐	☐
"Sparkler"	NV-01	John Ensign	☑	Education Funding; Medicare Funding; Health & Safety; Tax Fairness	"Ask Congress to make America the land of opportunity again, to keep the American Dream alive, to stand up for America's working families.	7/95	1996	1996	☐	☐
"Grab"	WI-01	Mark Neumann	☐	Health & Safety	"Tell Republican Congressman Neumann to stop putting health and safety on other families don't lose their loved ones." *"Call Rep. Neumann – [800-number]"*	8/1/95-8/4/95	1996	1996	☐	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"Sparkler"	GA-07	Bob Barr & John Linder	☑	Budget Priorities; Medicare Funding; Education Funding; Health & Safety; Tax Fairness	"Call 1-800..., Tell Congressmen Bob Barr and John Linder to keep alive the promise of America."	7/95	1996	1996	☐	☐
"Sparkler"	OK-02	Tom Coburn	☐	Budget Priorities; Education Funding; Medicare Funding; Health & Safety; Tax Fairness	"Ask Congress to make America the land of opportunity again, to keep the American Dream alive, to stand up for America's working families. *"Call Rep. Coburn – [800-number]"*	7/95	1996	1996	☐	☐
"Sparkler"	MA-08	Peter Torkildsen	☑	Education Funding; Medicare Funding; Health & Safety; Tax Fairness	"Ask Congress to make America the land of opportunity again, to keep the American Dream alive, to stand up for America's working families.	7/95	1996	1996	☐	☐
"Sparkler"	Generic (Rightdow er)		☑	Budget Priorities; Medicare Funding; Education Funding; Health & Safety; Tax Fairness	"Call [800-number] tell Congress to stand up for America's working families"	7/95	1996	1996	☐	☐
"Sparkler"	IL-08	Michael Flanagan	☑	Education Funding; Medicare Funding; Health & Safety; Tax Fairness	"Ask Congress to make America the land of opportunity again, to keep the American Dream alive, to stand up for America's working families	7/95	1996	1996	☐	☐
"Sparkler"	CT-05	Gary Franks	☑	Education Funding; Medicare Funding; Health & Safety; Tax Fairness	"Ask Congress to make America the land of opportunity again, to keep the American Dream alive, to stand up for America's working families.	7/95	1996	1996	☐	☐
"Sparkler"	NC-04	Fred Heineman	☑	Education Funding; Medicare Funding; Health & Safety; Tax Fairness	"Ask Congress to make America the land of opportunity again, to keep the American Dream alive, to stand up for America's working families.	7/95	1996	1996	☐	☐

476

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"Stand"	PA-21	Rep. Phil English *Newt Gingrich*	☐	Budget Priorities; Education Funding; Medicare Funding; Health & Safety; Tax Fairness	"Tell Congressman English to stop attacking America's working families" *"Call Rep. English [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Grain"	OK-02	Tom Coburn	☐	Health & Safety	"Tell Republican Congressman Coburn to stop cutting health and safety so other families don't lose their loved ones." *"Call Rep. Coburn – [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Stand"	TX-14	Greg Laughlin *Newt Gingrich*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressman Laughlin to stop attacking America's working families" *"Call Rep. Laughlin [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Grain"	TX-14	Greg Laughlin	☐	Health & Safety	"Tell Republican Congressman Laughlin to stop cutting health and safety so other families don't lose their loved ones." *"Call Rep. Laughlin – [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Grain"	IN-05	John Hostettler	☐	Health & Safety	"Tell Republican Congressman Hostettler to stop cutting health and safety so other families don't lose their loved ones." *"Call Rep. Hostettler – [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Stand"	IN-05	John Hostettler *Newt Gingrich*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressman Hostettler to stop attacking America's working families" *"Call Rep. Hostettler [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Grain"	ID-01	Helen Chenoweth	☐	Health & Safety	"Tell Republican Congresswoman Chenoweth to stop cutting health and safety so other families don't lose their loved ones." *"Call Rep. Chenoweth – [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Stand"	ID-01	Helen Chenoweth *Newt Gingrich*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congresswoman Chenoweth to stop attacking America's working families" *"Call Rep. Chenoweth [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐

475

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"Stand"	AR-04	Rep. Jay Dickey *Newt Gingrich*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressman Dickey to stop attacking America's working families" *"Call Rep. Dickey [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Grain"	AR-04	Rep. Jay Dickey	☐	Health & Safety	"Tell Republican Congressman Dickey to stop cutting health and safety so other families don't lose their loved ones." *"Call Rep. Dickey – [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Grain"	KY-01	Rep. Edward Whitfield	☐	Health & Safety	"Tell Republican Congressman Whitfield to stop cutting health and safety so other families don't lose their loved ones." *"Call Rep. Whitfield – [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Grain"	TN-03 TN-04	Rep. Zach Wamp & Van Hilleary	☐	Health & Safety	"Tell Republican Congressmen Wamp and Hilleary to stop cutting health and safety so other families don't lose their loved ones." *"Call Rep. Wamp and Hilleary – [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Grain"	OH-08	Frank Cremeens	☐	Health & Safety	"Tell Republican Congressman Cremeens to stop cutting health and safety so other families don't lose their loved ones." *"Call Rep. Cremeens – [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Stand"	UT-02	Rep. Enid Greene Waldholtz *Newt Gingrich*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congresswoman Waldholtz to stop attacking America's working families" *"Call Rep. Waldholtz [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Grain"	UT-02	Rep. Enid Greene Waldholtz	☐	Health & Safety	"Tell Republican Congresswoman Waldholtz to stop cutting health an safety so other families don't lose their loved ones." *"Call Rep. Waldholtz – [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Stand"	WI-01	Mark Neumann *Newt Gingrich*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressman Neumann to stop attacking America's working families" *"Call Rep. Neumann [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"Grain"	MI-09	Dick Chrysler	☐	Health & Safety	"Tell Republican Congressman Chrysler to stop cutting health and safety so other families don't lose their loved ones." *"Call Rep. Chrysler – [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Stand"	MI-09	Dick Chrysler *Newt Gingrich*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressman Chrysler to stop attacking America's working families" *"Call Rep. Chrysler [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Grain"	OR-05	Jim Bunn	☐	Health & Safety	"Tell Republican Congressman Bunn to stop cutting health and safet so other families don't lose their loved ones." *"Call Rep. Bunn – [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Stand"	OR-05	Jim Bunn *Newt Gingrich*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressman Bunn to stop attacking America's working families *"Call Rep. Bunn [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Stand"	KY-01	Rep. Edward Whitfield *Newt Gingrich*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressman Whitfield to stop attacking America's working families" *"Call Rep. Whitfield [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Stand"	OH-08	Frank Cremeans *Newt Gingrich*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressman Cremeans to stop attacking America's working families" *"Call Rep. Cremeans [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Stand"	OH-10 OH-19	Steve LaTourette & Martin Hoke *Newt Gingrich*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressman LaTourette and Hoke to stop attacking America's working families" *"Call Rep. LaTourette and Hoke [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Grain"	IA-04	Greg Ganske	☐	Health & Safety	"Tell Republican Congressman Ganske to stop cutting health and safety so other families don't lose their loved ones." *"Call Rep. Ganske – [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"Grain"	TX-09	Steve Stockman	☐	Health & Safety	"Tell Republican Congressman Stockman to stop cutting health and safety so other families don't lose their loved ones." *"Call Rep. Stockman – [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Stand"	TX-09	Steve Stockman *Newt Gingrich*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressman Stockman to stop attacking America's working families" *"Call Rep. Stockman [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Grain"	OH-12	John Kasich	☐	Health & Safety	"Tell Republican Congressman Kasich to stop cutting health and safety so other families don't lose their loved ones." *"Call Rep. Kasich – [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Stand"	OH-12	John Kasich *Newt Gingrich*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressman Kasich to stop attacking America's working families" *"Call Rep. Kasich [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Grain"	OH-10 OH-19	Steve LaTourette & Martin Hoke	☐	Health & Safety	"Tell Republican Congressman LaTourette and Hoke to stop cutting health and safety so other families don't lose their loved ones." *"Call Rep. LaTourette and Hoke – [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Stand"	CA-22	Andrea Seastrand *Newt Gingrich*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congresswoman Seastrand to stop attacking America's working families" *"Call Rep. Seastrand [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Stand"	NV-01	John Ensign *Newt Gingrich*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressman Ensign to stop attacking America's working families" *"Call Rep. Seastrand [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Stand"	OK-02	Tom Coburn *Newt Gingrich*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressman Coburn to stop attacking America's working families" *"Call Rep. Coburn [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐

480

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Grain"	Generic		☐	Health & Safety	"Tell your Congressman to stop cutting health and safety so other families don't lose their loved ones." *"Call your Representative – [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Ron Hayes"	GA-07	Bob Barr	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Republican Bob Barr to stop pandering to big business and the rich. Call [800-number] and stand up for America's working families."	Not available	1996	1996	☐	☐
"Patrick"		Generic	☐	Health & Safety; Medicare Funding; Education Funding	"Tell the Republicans to stop cutting health and safety and to stop cutting medicare and college loans. Call [800-number] and stand up for America's families."	Not available	1996	1996	☐	☐
"Choice"		Generic	☐	Budget Priorities; Medicare Funding; Education Funding; Health & Safety; Tax Fairness	"Get informed. Get involved. Stand up for what's right." *"Call Congress – [800-number]"*	Not available	1996	1996	☐	☐
"Parent"		Generic	☐	Budget Priorities; Medicare Funding; Education Funding; Health & Safety; Tax Fairness	"Get informed, get involved, and stand up for our families." *"Call Congress – [800-number]"*	Not available	1996	1996	☐	☐
"Medicare"	Generic		☐		"Get informed, get involved, and stand up for what's right." *"Call Congress – [800-number]"*	10/95		1996	☐	☐
"Medicare"	LA-08	Tauzin	☑	Medicare Funding	"Get informed, get involved, and stand up for our families."	10/95	1996	1996	☐	☐
"Medicare"	Camp	Camp	☑	Medicare Funding	"Get informed, get involved, and stand up for our families."	10/95	1996	1996	☐	☐
"Medicare"	NY-17 NJ-07 NY-04	Susan Molinari, Bob Franks, & Pitas	☑	Medicare Funding	"Get informed, get involved, and stand up for our families."	10/95	1996	1996	☐	☐

479

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Stand"	IA-04	Greg Ganske	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressman Ganske to stop attacking America's working families" *"Call Rep. Ganske [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
		Newt Gingrich								
"Grain"	NV-01	John Ensign	☐	Health & Safety	"Tell Republican Congressman Ensign to stop cutting health and safety so other families don't lose their loved ones." *"Call Rep. Ensign – [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Grain"	CA-22	Andrea Seastrand	☐	Health & Safety	"Tell Republican Congresswoman Seastrand to stop cutting health an safety so other families don't lose their loved ones." *"Call Rep. Seastrand – [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Grain"	WA-01 WA-09	Rick White & Randy Tate	☐	Health & Safety	"Tell Republican Congressmen White and Tate to stop cutting health and safety so other families don't lose their loved ones." *"Call Rep. White and Tate – [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Stand"	WA-01 WA-09	Rick White & Randy Tate	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressmen White and Tate to stop attacking America's working families." *"Call Rep. White and Tate [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
		Newt Gingrich								
"Grain"	PA-21	Rep. Phil English	☐	Health & Safety	"Tell Republican Congressmen English to stop cutting health and safety so other families don't lose their loved ones." *"Call Rep. English – [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
"Stand"	TN-03 TN-04	Rep. Zach Wamp & Van Hilleary	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressmen Wamp and Hilleary to stop attacking America's working families" *"Call Rep. Wamp and Hilleary [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
		Newt Gingrich								
"Stand"	Generic		☐	Budget Priorities; Education Funding; Medicare Funding; Health & Safety; Tax Fairness	"Tell your Congressman to stop attacking America's working families. *"Call your Representative [800-number]"*	8/21/95-9/4/95	1996	1996	☐	☐
		Newt Gingrich								

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"Families"	ME-01	James Longley, Newt Gingrich, Bill Clinton *Newt Gingrich, Bill Clinton, Al Gore, Dole*	☐	Budget Priorities; Education Funding; Medicare Funding; Tax Fairness	"Now it's up to us. We need to get involved and speak out. Let's tell Congressman Longley: this time don't vote for the wealthy special interests. This time vote for America's working families." *"Call Rep. Longley – [800-number]"*	12/5/95-12/11/95	1996	1996	☐	☐
"Families"	IN-08	John Hostettler, Newt Gingrich, Bill Clinton *Newt Gingrich, Bill Clinton, Al Gore, Dole*	☐	Budget Priorities; Education Funding; Medicare Funding; Tax Fairness	"Now it's up to us. We need to get involved and speak out. Let's tell Congressman Hostettler: this time don't vote for the wealthy special interests. This time vote for America's working families." *"Call Rep. Hostettler – [800-number]"*	12/5/95-12/11/95	1996	1996	☐	☐
"Families"	CA-22	Andrea Seastrand, Newt Gingrich, Bill Clinton *Newt Gingrich, Bill Clinton, Al Gore, Dole*	☐	Budget Priorities; Education Funding; Medicare Funding; Tax Fairness	"Now it's up to us. We need to get involved and speak out. Let's tell Congresswoman Seastrand: this time don't vote for the wealthy special interests. This time vote for America's working families." *"Call Rep. Seastrand – [800-number]"*	12/5/95-12/11/95	1996	1996	☐	☐
"Families"	ID-01	Helen Chenoweth, Newt Gingrich, Bill Clinton *Newt Gingrich, Bill Clinton, Al Gore, Dole*	☐	Budget Priorities; Education Funding; Medicare Funding; Tax Fairness	"Now it's up to us. We need to get involved and speak out. Let's tell Congresswoman Chenoweth: this time don't vote for the wealthy special interests. This time vote for America's working families." *"Call Rep. Chenoweth – [800-number]"*	12/5/95-12/11/95	1996	1996	☐	☐
"Families"	CA-01	Frank Riggs, Newt Gingrich, Bill Clinton *Newt Gingrich, Bill Clinton, Al Gore, Dole*	☐	Budget Priorities; Education Funding; Medicare Funding; Tax Fairness	"Now it's up to us. We need to get involved and speak out. Let's tell Congressman Riggs: this time don't vote for the wealthy special interests. This time vote for America's working families." *"Call Rep. Riggs – [800-number]"*	12/5/95-12/11/95	1996	1996	☐	☐
"Families"	NC-04	Fred Heineman, Newt Gingrich, Bill Clinton *Newt Gingrich, Bill Clinton, Al Gore, Dole*	☐	Budget Priorities; Education Funding; Medicare Funding; Tax Fairness	"Now it's up to us. We need to get involved and speak out. Let's tell Congressman Heineman: this time don't vote for the wealthy special interests. This time vote for America's working families." *"Call Rep. Heineman – [800-number]"*	12/5/95-12/11/95	1996	1996	☐	☐

482

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"Medicare"	IL-11	Jerry Weller	☑	Medicare Funding	"Get informed, get involved, and stand up for our families."	10/96	1996	1996	☐	☐
"Medicare"	CT-05 CT-06	Nancy Johnson & Gary Frank	☑	Medicare Funding	"Get informed, get involved, and stand up for our families."	10/96	1996	1996	☐	☐
"Families"	KY-01	Edward Whitfield, Newt Gingrich, Bill Clinton *Newt Gingrich, Bill Clinton, Al Gore, Dole*	☐	Budget Priorities; Education Funding; Medicare Funding; Tax Fairness	"Now it's up to us. We need to get involved and speak out. Let's tell Congressman Whitfield: this time don't vote for the wealthy special interests. This time vote for America's working families." *"Call Rep. Whitfield – [800-number]"*	12/5/95-12/11/95	1996	1996	☐	☐
"Families"	OR-05	Jim Bunn, Newt Gingrich, Bill Clinton *Newt Gingrich, Bill Clinton, Al Gore, Dole*	☐	Budget Priorities; Education Funding; Medicare Funding; Tax Fairness	"Now it's up to us. We need to get involved and speak out. Let's tell Congressman Bunn: this time don't vote for the wealthy special interests. This time vote for America's working families." *"Call Rep. Bunn – [800-number]"*	12/5/95-12/11/95	1996	1996	☐	☐
"Families"	OH-08	Frank Cremeans, Newt Gingrich, Bill Clinton *Newt Gingrich, Bill Clinton, Al Gore, Dole*	☐	Budget Priorities; Education Funding; Medicare Funding; Tax Fairness	"Now it's up to us. We need to get involved and speak out. Let's tell Congressman Cremeans: this time don't vote for the wealthy special interests. This time vote for America's working families." *"Call Rep. Cremeans – [800-number]"*	12/5/95-12/11/95	1996	1996	☐	☐
"Families"	NV-01	John Ensign, Newt Gingrich, Bill Clinton *Newt Gingrich, Bill Clinton, Al Gore, Dole*	☐	Budget Priorities; Education Funding; Medicare Funding; Tax Fairness	"Now it's up to us. We need to get involved and speak out. Let's tell Congressman Ensign: this time don't vote for the wealthy special interests. This time vote for America's working families." *"Call Rep. Ensign – [800-number]"*	12/5/95-12/11/95	1996	1996	☐	☐
"Families"	MI-08	Dick Chrysler, Newt Gingrich, Bill Clinton *Newt Gingrich, Bill Clinton, Al Gore, Dole*	☐	Budget Priorities; Education Funding; Medicare Funding; Tax Fairness	"Now it's up to us. We need to get involved and speak out. Let's tell Congressman Chrysler: this time don't vote for the wealthy special interests. This time vote for America's working families." *"Call Rep. Chrysler – [800-number]"*	12/5/95-12/11/95	1996	1996	☐	☐

481

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Families"	ID-01	Helen Chenoweth, Newt Gingrich, Bill Clinton *Newt Gingrich, Bill Clinton, Al Gore, Dole*	☐	Budget Priorities; Medicare Funding; Education Funding; Tax Fairness	"Now it's up to us. We need to get involved and speak out. Let's tell Congresswoman Chenoweth: this time don't vote for the wealthy special interests. This time vote for America's working families." *"Call Rep. Chenoweth – [800-number]"*	12/5/95-12/11/95	1996	1996	☐	☐
"Fair"	TX-14	Greg Laughlin	☑	Budget Priorities	"Send Congressman Greg Laughlin a message."	12/1/95-12/12/95	1996	1996	☐	☐
"Fair"	OH-12	John Kasich	☑	Budget Priorities	"Send Congressman John Kasich a message."	12/1/95-12/12/95	1996	1996	☐	☐
"Fair"	MI-08	Dick Chrysler	☑	Budget Priorities	"Send Congressman Dick Chrysler a message."	12/1/95-12/12/95	1996	1996	☐	☐
"Fair"	IA-04	Greg Ganske	☑	Budget Priorities	"Send Congressman Greg Ganske a message."	12/1/95-12/12/95	1996	1996	☐	☐
"Fair"	NJ-08	Bill Martini	☑	Budget Priorities	"Send Congressman Bill Martini a message."	12/1/95-12/12/95	1996	1996	☐	☐
"Too Far"	WI-01	Mark Neumann & Newt Gingrich *Newt Gingrich*	☐	Budget Priorities; Medicare Funding; Medicaid; Education Funding; Tax Fairness	"Let's tell Congressman Neumann to stop the political games and stand up for working families for a change." *"Call Neumann – [800-number]"*	1/17/96-1/23/96	3/19/96	11/5/96	☐	☐
"Too Far"	ID-01	Helen Chenoweth & Newt Gingrich *Newt Gingrich*	☐	Budget Priorities; Medicare Funding; Medicaid; Education Funding; Tax Fairness	"Let's tell Congresswoman Chenoweth to stop the political games an stand up for working families for a change." *"Call Chenoweth – [800-number]"*	1/17/96-1/23/96	3/26/96	11/5/96	☐	☐
"Too Far"	CA-22	Andrea Seastrand & Newt Gingrich *Newt Gingrich*	☐	Budget Priorities; Medicare Funding; Medicaid; Education Funding; Tax Fairness	"Let's tell Congressman Seastrand to stop the political games and stand up for working families for a change." *"Call Seastrand – [800-number]"*	1/17/96-1/23/96	3/26/96	11/5/96	☐	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Families"	WA-01 WA-08	Rick White, Randy Tate, Newt Gingrich, Bill Clinton *Newt Gingrich, Bill Clinton, Al Gore, Dole*	☐	Budget Priorities; Education Funding; Medicare Funding; Tax Fairness	"Now it's up to us. We need to get involved and speak out. Let's tell Congressmen White and Tate: this time don't vote for the wealthy special interests. This time vote for America's working families." *"Call Reps. White and Tate – [800-number]"*	12/5/95-12/11/95	1996	1996	☐	☐
"Families"	IA-04	Greg Ganske, Newt Gingrich, Bill Clinton *Newt Gingrich, Bill Clinton, Al Gore, Dole*	☐	Budget Priorities; Education Funding; Medicare Funding; Tax Fairness	"Now it's up to us. We need to get involved and speak out. Let's tell Congressman Ganske: this time don't vote for the wealthy special interests. This time vote for America's working families." *"Call Rep. Ganske – [800-number]"*	12/5/95-12/11/95	1996	1996	☐	☐
"Families"	AR-04	Jay Dickey, Newt Gingrich, Bill Clinton *Newt Gingrich, Bill Clinton, Al Gore, Dole*	☐	Budget Priorities; Education Funding; Medicare Funding; Tax Fairness	"Now it's up to us. We need to get involved and speak out. Let's tell Congressman Dickey: this time don't vote for the wealthy special interests. This time vote for America's working families." *"Call Rep. Jay Dickey – [800-number]"*	12/5/95-12/11/95	1996	1996	☐	☐
"Families"	TX-08	Steve Stockman, Newt Gingrich, Bill Clinton *Newt Gingrich, Bill Clinton, Al Gore, Dole*	☐	Budget Priorities; Education Funding; Medicare Funding; Tax Fairness	"Now it's up to us. We need to get involved and speak out. Let's tell Congressman Stockman: this time don't vote for the wealthy special interests. This time vote for America's working families." *"Call Rep. Stockman – [800-number]"*	12/5/95-12/11/95	1996	1996	☐	☐
"Families"	TN-04	Van Hilleary, Newt Gingrich, Bill Clinton *Newt Gingrich, Bill Clinton, Al Gore, Dole*	☐	Budget Priorities; Education Funding; Medicare Funding; Tax Fairness	"Now it's up to us. We need to get involved and speak out. Let's tell Congressman Hilleary: this time don't vote for the wealthy special interests. This time vote for America's working families." *"Call Rep. Hilleary – [800-number]"*	12/5/95-12/11/95	1996	1996	☐	☐
"Families"	Generic	Newt Gingrich, Bill Clinton *Newt Gingrich, Bill Clinton, Al Gore, Dole*	☐	Budget Priorities; Education Funding; Medicare Funding; Tax Fairness	"Now it's up to us. We need to get involved and speak out. Let's tell our Congressmen: this time don't vote for the wealthy special interests. This time vote for America's working families." *"Call your Representative – [800-number]"*	12/5/95-12/11/95		1996	☐	☐

Title	District	Officeholder/Candidate: Named in normal type; Pictured in italic type	Radio?	Issue(s) Discussed	Call to Action: Audio in normal type; Video in italic type	Dates: Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"Too Far"	OH-12	John Kasich & Newt Gingrich *Newt Gingrich*	☐	Budget Priorities; Medicare Funding; Medicaid; Education Funding; Tax Fairness	"Let's tell Congressmen Kasich to stop the political games and stand up for working families for a change." *"Call Kasich – [800-number]"*	1/17/96-1/23/96	3/19/96	11/5/96	☐	☐
"Too Far"	OH-08	Frank Cremeans & Newt Gingrich *Newt Gingrich*	☐	Budget Priorities; Medicare Funding; Medicaid; Education Funding; Tax Fairness	"Let's tell Congressmen Cremeans to stop the political games and stand up for working families for a change." *"Call Cremeans – [800-number]"*	1/17/96-1/23/96	3/19/96	11/5/96	☐	☐
"Too Far"	OH-01	Steve Chabot & Newt Gingrich *Newt Gingrich*	☐	Budget Priorities; Medicare Funding; Medicaid; Education Funding; Tax Fairness	"Let's tell Congressmen Chabot to stop the political games and stand up for working families for a change." *"Call Chabot – [800-number]"*	1/17/96-1/23/96	3/19/96	11/5/96	☐	☐
"Too Far"	NV-01	John Ensign & Newt Gingrich *Newt Gingrich*	☐	Budget Priorities; Medicare Funding; Medicaid; Education Funding; Tax Fairness	"Let's tell Congressmen Ensign to stop the political games and stand up for working families for a change." *"Call Ensign – [800-number]"*	1/17/96-1/23/96	9/3/96	11/5/96	☐	☐
"Too Far"	NC-04	Fred Heineman & Newt Gingrich *Newt Gingrich*	☐	Budget Priorities; Medicare Funding; Medicaid; Education Funding; Tax Fairness	"Let's tell Congressmen Heineman to stop the political games and stand up for working families for a change." *"Call Heineman – [800-number]"*	1/17/96-1/23/96	5/7/96	11/5/96	☐	☐
"Too Far"	MI-08	Dick Chrysler & Newt Gingrich *Newt Gingrich*	☐	Budget Priorities; Medicare Funding; Medicaid; Education Funding; Tax Fairness	"Let's tell Congressmen Chrysler to stop the political games and stan up for working families for a change." *"Call Chrysler – [800-number]"*	1/17/96-1/23/96	8/6/96	11/5/96	☐	☐
"Too Far"	CA-01	Frank Riggs & Newt Gingrich *Newt Gingrich*	☐	Budget Priorities; Medicare Funding; Medicaid; Education Funding; Tax Fairness	"Let's tell Congressmen Riggs to stop the political games and stand u for working families for a change." *"Call Riggs – [800-number]"*	1/17/96-1/23/96	3/26/96	11/5/96	☐	☐

Title	District	Officeholder/Candidate: Named in normal type; Pictured in italic type	Radio?	Issue(s) Discussed	Call to Action: Audio in normal type; Video in italic type	Dates: Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"Too Far"	TX-14	Greg Laughlin & Newt Gingrich *Newt Gingrich*	☐	Budget Priorities; Medicare Funding; Medicaid; Education Funding; Tax Fairness	"Let's tell Congressmen Laughlin to stop the political games and stan up for working families for a change." *"Call Laughlin – [800-number]"*	1/17/96-1/23/96	3/12/96	11/5/96	☐	☐
"Too Far"	WA-01 WA-08	Rick White, Randy Tate, & Newt Gingrich *Newt Gingrich*	☐	Budget Priorities; Medicare Funding; Medicaid; Education Funding; Tax Fairness	"Let's tell Congressmen White and Tate to stop the political games a stand up for working families for a change." *"Call White and Tate – [800-number]"*	1/17/96-1/23/96	9/17/96	11/5/96	☐	☐
"Too Far"	PA-21	Phil English & Newt Gingrich *Newt Gingrich*	☐	Budget Priorities; Medicare Funding; Medicaid; Education Funding; Tax Fairness	"Let's tell Congressmen English to stop the political games and stand up for working families for a change." *"Call English – [800-number]"*	1/17/96-1/23/96	4/23/96	11/5/96	☐	☐
"Too Far"	OR-05	Jim Bunn & Newt Gingrich *Newt Gingrich*	☐	Budget Priorities; Medicare Funding; Medicaid; Education Funding; Tax Fairness	"Let's tell Congressmen Bunn to stop the political games and stand u for working families for a change." *"Call Bunn – [800-number]"*	1/17/96-1/23/96	5/21/96	11/5/96	☐	☐
"Too Far"	IA-04	Greg Ganske & Newt Gingrich *Newt Gingrich*	☐	Budget Priorities; Medicare Funding; Medicaid; Education Funding; Tax Fairness	"Let's tell Congressmen Ganske to stop the political games and stand up for working families for a change." *"Call Ganske – [800-number]"*	1/17/96-1/23/96	6/4/96	11/5/96	☐	☐
"Too Far"	AR-04	Jay Dickey & Newt Gingrich *Newt Gingrich*	☐	Budget Priorities; Education Funding; Medicare Funding; Tax Fairness	"Let's tell Congressmen Dickey to stop the political games and stand up for working families for a change." *"Call Jay Dickey – [800-number]"*	1/17/96-1/23/96	5/21/96	11/5/96	☐	☐
"Too Far"	ME-01	James Longley & Newt Gingrich *Newt Gingrich*	☐	Budget Priorities; Medicare Funding; Medicaid; Education Funding; Tax Fairness	"Let's tell Congressmen Longley to stop the political games and stand up for working families for a change." *"Call Longley – [800-number]"*	1/17/96-1/23/96	9/17/96	11/5/96	☐	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type Pictured in *italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type Video in *italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"1995"	OH-08	Frank Cremeans	☐	Minimum Wage; Medicare Funding; Education Funding; Tax Fairness	"Let's tell Congressman Cremeans: Raise the minimum wage and stop voting for America's wealthy families." *"Call Rep. Cremeans–Raise minimum wage [800-number]"*	4/9/95-4/15/95	3/19/96	11/5/96	☐	☐
"1995"	IN-08	John Hostettler	☐	Minimum Wage; Medicare Funding; Education Funding; Tax Fairness	"Let's tell Congressman Hostettler: Raise the minimum wage and stop voting for America's wealthy families." *"Call Rep. Hostettler–Raise minimum wage [800-number]"*	4/9/95-4/15/95	5/7/96	11/5/96	☑	☐
"1995"	NE-02	Jon Christensen	☐	Minimum Wage; Medicare Funding; Education Funding; Tax Fairness	"Let's tell Congressman Christensen: Raise the minimum wage and start voting for America's working families." *"Call Rep. Christensen–Raise minimum wage [800-number]"*	4/9/95-4/15/95	5/14/96	11/5/96	☑	☐
"1995"	OR-05	Jim Bunn	☐	Minimum Wage; Medicare Funding; Education Funding; Tax Fairness	"Let's tell Congressman Bunn: Raise the minimum wage and start voting for America's working families." *"Call Rep. Bunn–Raise minimum wage [800-number]"*	4/9/95-4/15/95	5/21/96	11/5/96	☐	☐
"1995"	MI-08	Dick Chrysler	☐	Minimum Wage; Medicare Funding; Education Funding; Tax Fairness	"Let's tell Congressman Chrysler: Raise the minimum wage and start voting for America's working families." *"Call Rep. Chrysler–Raise minimum wage [800-number]"*	4/9/95-4/15/95	6/4/96	11/5/96	☐	☐
"1995"	KY-01	Edward Whitfield	☐	Minimum Wage; Medicare Funding; Education Funding; Tax Fairness	"Let's tell Congressman Whitfield: Raise the minimum wage and start voting for America's working families." *"Call Rep. Whitfield–Raise minimum wage [800-number]"*	4/9/95-4/15/95	5/28/96	11/5/96	☐	☐
"1995"	CA-22	Andrea Seastrand	☐	Minimum Wage; Medicare Funding; Education Funding; Tax Fairness	"Let's tell Congressman Seastrand: Raise the minimum wage and stop voting for America's working families." *"Call Rep. Seastrand–Raise minimum wage [800-number]"*	4/9/95-4/15/95	3/26/96	11/5/96	☐	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type Pictured in *italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type Video in *italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Toe For"	KY-01	Edward Whitfield & Newt Gingrich *Newt Gingrich*	☐	Budget Priorities; Medicare Funding; Medicaid; Education Funding; Tax Fairness	"Let's tell Congressman Whitfield to stop the political games and stand up for working families for a change." *"Call Whitfield – [800-number]"*	1/17/96-1/23/96	3/26/96	11/5/96	☐	☐
"Toe For"	Generic	Newt Gingrich, Bill Clinton *Newt Gingrich, Bill Clinton, & Al Gore*	☐	Budget Priorities; Education Funding; Medicare Funding; Tax Fairness	"Let's tell the Republicans to stop the political games and stand up for working families for a change" *"Call Congress – [800-number]"*	1/17/96-1/23/96	2/7/96 2/20/96	11/5/96	☑	☐
"Why"	CA-49	Brian Bilbray & Newt Gingrich	☑	Budget Priorities; Medicare Funding; Medicaid; Education Funding; Health & Safety	"Call [800-number] Tell Congressman Bob Bilbray to say no to the Gingrich budget and to stand up for America's working families for a change. Call [800-number]"	1/17/96-1/23/96	3/26/96	11/5/96	☐	☐
"Minimum Wage" (approximate date)	WI-01	Mark Neumann *Mark Neumann*	☐	Minimum Wage; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressman Neumann: raise the minimum wage." *"Call Rep. Neumann, Raise the Minimum Wage, [800-number]"*	Not available	8/13/96	11/5/96	☐	☐
"1995"	AR-04	Jay Dickey	☐	Minimum Wage; Medicare Funding; Education Funding; Tax Fairness	"Let's tell Congressman Dickey: Raise the minimum wage and start voting for America's working families" *"Call Rep. Dickey–Raise minimum wage [800-number]"*	4/9/95-4/15/95	5/21/96	11/5/96	☐	☐
"1995"	MS-04	Sonny Montgomery	☐	Minimum Wage; Medicare Funding; Education Funding; Tax Fairness	"Let's tell Congressman Montgomery: Raise the minimum wage and start voting for America's working families." *"Call Rep. Montgomery–Raise minimum wage [800-number]"*	4/9/95-4/15/95	3/12/96	11/5/96	☐	☐
"1995"	NC-04	Fred Heineman	☐	Minimum Wage; Medicare Funding; Education Funding; Tax Fairness	"Let's tell Congressman Heineman: Raise the minimum wage and stop voting for America's working families." *"Call Rep. Heineman–Raise minimum wage [800-number]"*	4/9/95-4/15/95	3/7/96	11/5/96	☑	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate: Named in normal type; Pictured in italic type	Radio?	Issue(s) Discussed	Call to Action: Audio in normal type; Video in italic type	Dates: Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"1997"	WI-01	Mark Neumann	☐	Minimum Wage; Medicare Funding; Education Funding; Tax Fairness	"Let's tell Congressman Neuman: Raise the minimum wage and start voting for America's working families." *"Call Rep. Neuman-Raise minimum wage [800-number]"*	4/8/98-4/15/98	9/10/98	11/3/98	☐	☐
"1997"	ME-01	James Longley	☐	Minimum Wage; Medicare Funding; Education Funding; Tax Fairness	"Let's tell Congressman Longley: Raise the minimum wage and start voting for America's working families." *"Call Rep. Longley-Raise minimum wage [800-number]"*	4/8/98-4/15/98	9/17/98	11/3/98	☐	☐
"1997"	NY-26 NY-23	Jim Walsh & Sherwood Boehlert	☐	Minimum Wage; Medicare Funding; Education Funding; Tax Fairness	"Let's tell Congressmen Walsh & Boehlert: Raise the minimum wage and start voting for America's working families." *"Call Rep. Walsh & Boehlert-Raise minimum wage [800-number]"*	4/8/98-4/15/98	9/10/98	11/3/98	☐	☐
"1997"	NY-01	John Sweeney	☐	Minimum Wage; Medicare Funding; Education Funding; Tax Fairness	"Let's tell Congressman Sweeney: Raise the minimum wage and start voting for America's working families." *"Call Rep. John Sweeney-Raise minimum wage [800-number]"*	4/8/98-4/13/98	9/3/98	11/3/98	☐	☐
"Four"	CT-05	Gary Franks	☑	Minimum Wage; Medicare Funding; Education Funding; Tax Fairness	"Call [800-number] Let's tell Congressman Franks raise the minimum wage. [800-number] tell Congressman Franks to start voting for America's working families. How that would be a change"	4/8/98-4/13/98	9/10/98	11/3/98	☐	☐
"Four"	Gamm	Gamm	☑	Minimum Wage; Medicare Funding; Education Funding; Tax Fairness	"Call [800-number] Let's tell Congressman Gamm raise the minimum wage. [800-number] tell Congressman Gamm to start voting for America's working families. How that would be a change"	4/8/98-4/13/98		11/3/98	☐	☐
"Four"	MA-08	Peter Blute	☑	Minimum Wage; Medicare Funding; Education Funding; Tax Fairness	"Call [800-number] Let's tell Congressman Blute raise the minimum wage. [800-number] tell Congressman Blute to start voting for America's working families. How that would be a change"	4/8/98-4/15/98	9/17/98	11/3/98	☐	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate: Named in normal type; Pictured in italic type	Radio?	Issue(s) Discussed	Call to Action: Audio in normal type; Video in italic type	Dates: Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"Minimum Wage"	OH-16	Martin Hoke	☑	Minimum Wage; Medicare Funding; Education Funding; Tax Fairness	"Let's tell Congressman Hoke: Raise the minimum wage and start voting for America's working families."	4/8/98-4/15/98	3/10/98	11/3/98	☐	☐
"1997"	OH-01	Steve Chabot	☐	Minimum Wage; Medicare Funding; Education Funding; Tax Fairness	"Let's tell Congressman Chabot: Raise the minimum wage and start voting for America's working families." *"Call Rep. Chabot-Raise minimum wage [800-number]"*	4/8/98-4/13/98	3/10/98	11/3/98	☐	☐
"Minimum Wage"	OH-16	Steve Latourette	☑	Minimum Wage; Medicare Funding; Education Funding; Tax Fairness	"Let's tell Congressman Latourette: Raise the minimum wage and sta voting for America's working families."	4/8/98-4/13/98	3/10/98	11/3/98	☐	☐
"1997"	KS-04	Todd Tiahrt	☐	Minimum Wage; Medicare Funding; Education Funding; Tax Fairness	"Let's tell Congressman Tiahrt: Raise the minimum wage and start voting for America's working families." *"Call Rep. Tiahrt-Raise minimum wage [800-number]"*	4/8/98-4/13/98	8/4/98	11/3/98	☐	☐
"1997"	IA-04	Greg Ganske	☐	Minimum Wage; Medicare Funding; Education Funding; Tax Fairness	"Let's tell Congressman Ganske: Raise the minimum wage and start voting for America's working families." *"Call Rep. Ganske-Raise minimum wage [800-number]"*	4/8/98-4/13/98	8/4/98	11/3/98	☐	☐
"1997"	TX-14	Greg Laughlin	☐	Minimum Wage; Medicare Funding; Education Funding; Tax Fairness	"Let's tell Congressman Laughlin: Raise the minimum wage and start voting for America's working families." *"Call Rep. Laughlin-Raise minimum wage [800-number]"*	4/8/98-4/13/98	3/12/98	11/3/98	☐	☐
"1997"	WA-01 WA-08	Rick White & Randy Tate	☐	Minimum Wage; Medicare Funding; Education Funding; Tax Fairness	"Let's tell Congressmen White & Tate: Raise the minimum wage and start voting for America's working families." *"Call Rep. White & Tate-Raise minimum wage [800-number]"*	4/8/98-4/13/98	9/17/98	11/3/98	☐	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate: Named in normal type; Pictured in italic type	Radio?	Issue(s) Discussed	Call to Action: Audio in normal type; Video in italic type	Dates: Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Hit"	PA-13	John Fox	☑	Minimum Wage	"If you think that's wrong, call [800-number] Tell Congressman Fox t stop the political games and raise the minimum wage. [800-number] Tell Congressman Fox it's time to start voting for America's working families for a change."	6/20/96-6/23/96	4/23/96	11/5/96	☐	☐
"Hit"	OH-10	Martin Hoke	☑	Minimum Wage	"If you think that's wrong, call [800-number] Tell Congressman Hoke to stop the political games and raise the minimum wage. [800-number] Tell Congressman Hoke it's time to start voting for America' working families for a change."	6/20/96-6/23/96	3/19/96	11/5/96	☐	☐
"Hit"	IL-11 IL-06	Michael Flanagan & Jerry Weller	☑	Minimum Wage	"If you think that's wrong, call [800-number] Tell Congressman Flanagan and Weller to stop the political games and raise the minimu wage. [800-number] Tell Congressman Flanagan it's time to start voting for America's working families for a change."	6/20/96-6/23/96	3/19/96	11/5/96	☐	☐
"Hit"	CT-06	Gary Franks	☑	Minimum Wage	"If you think that's wrong, call [800-number] Tell Congressman Frank to stop the political games and raise the minimum wage. [800-number] Tell Congressman Franks it's time to start voting for America's working families for a change."	6/20/96-6/23/96	9/10/96	11/5/96	☐	☐
"Hit"	WI-01	Mark Neumann	☑	Minimum Wage	"If you think that's wrong, call [800-number] Tell Congressman Neumann to stop the political games and raise the minimum wage. [800-number] Tell Congressman Neumann it's time to start voting for America's working families for a change."	6/20/96-6/23/96	9/10/96	11/5/96	☐	☐
"Relief"	MI-08	John Hostettler	☑	Minimum Wage; Medicare Funding; Education Funding; Tax Fairness	"It's time working people got a raise. Call [800-number] Tell Congressman John Hostettler. Stop the games. Stop the gimmicks and raise the minimum wage. [800-#] Tell Congressman Hostettler, it's time to start voting for America's working families."	5/1/96-6/5/96 (approximately)	5/7/96	11/5/96	☑	☐
"Minimum Wage" (approximate date)	CT-04	Chris Shays	☑	Minimum Wage; Medicare Funding; Education Funding; Tax Fairness	"Call [800-number] Let's tell Congressman Shays raise the minimum wage. [800-number] tell Congressman Shays to start voting for America's working families. Now that would be a change!"	Not available	9/10/96	11/5/96	☐	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate: Named in normal type; Pictured in italic type	Radio?	Issue(s) Discussed	Call to Action: Audio in normal type; Video in italic type	Dates: Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Four"	OH-10 OH-19	Hoke & Steve Latourette	☑	Minimum Wage; Medicare Funding; Education Funding; Tax Fairness	"Call [800-number] Let's tell Congressman Hoke and Latourette raise the minimum wage. [800-number] tell Congressmen Hoke and Latourette to start voting for America's working families. Now that would be a change!"	4/8/96-4/15/96	3/19/96	11/5/96	☐	☐
"Four"	IL-11 IL-06	Michael Flanagan & Jerry Weller	☑	Minimum Wage; Medicare Funding; Education Funding; Tax Fairness	"Call [800-number] Let's tell Congressman Flanagan and Weller raise the minimum wage. [800-number] tell Congressmen Flanagan and Weller to start voting for America's working families. Now that would be a change!"	4/8/96-4/15/96	3/19/96	11/5/96	☐	☐
"Four"	MO-2	Robert Edich	☑	Minimum Wage; Medicare Funding; Education Funding; Tax Fairness	"Call [800-number] Let's tell Congressman Edich raise the minimum wage. [800-number] tell Congressmen Edich to start voting for America's working families. Now that would be a change!"	4/8/96-4/15/96	3/5/96	11/5/96	☐	☐
"Four"	CT-04	Chris Shays	☑	Minimum Wage; Medicare Funding; Education Funding; Tax Fairness	"Call [800-number] Let's tell Congressman Shays raise the minimum wage. [800-number] tell Congressmen Shays to start voting for America's working families. Now that would be a change!"	4/8/96-4/15/96	9/10/96	11/5/96	☐	☐
"Raise"	CT-05	Gary Franks	☑	Minimum Wage	"It's time working people got a raise. Call [800-number] Tell Congressman Gary Franks. Stop the games. Stop the gimmicks and raise the minimum wage. [800-number] Tell Congressman Franks, it' time to start voting for America's working families."	5/1/96-5/5/96 (approximately)	9/10/96	11/5/96	☐	☐
"Minimum Wage" (approximate date)	CT-05	Gary Franks	☑	Minimum Wage; Medicare Funding; Education Funding; Tax Fairness	"Call [800-number] Let's tell Congressman Franks raise the minimum wage. [800-number] tell Congressmen Franks to start voting for America's working families. Now that would be a change!"	Not available	9/10/96	11/5/96	☐	☐
"Minimum Wage" (approximate date)	WA-05	George Nethercutt	☐	Minimum Wage; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressman Nethercutt: raise the minimum wage."	Not available	9/17/96	11/5/96	☐	☐
		George Nethercutt			"Call Rep. Nethercutt. Raise the Minimum Wage. [800-number]"					

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates *Broadcast*	*Primary*	*General Election*	Broadcast within... *30 Days of Primary?*	*60 Days of General Election?*
"People"	OH-01	Steve Chabot *Steve Chabot*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressman Chabot: raise the minimum wage" *"Call Rep. Chabot – [800-number]"*	5/20/98-6/23/98	3/10/98	11/5/98	☐	☐
"People"	OR-05	Jim Bunn *Jim Bunn*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressman Bunn: raise the minimum wage" *"Call Rep. Bunn – [800-number]"*	5/20/98-6/23/98	5/21/98	11/5/98	☑	☐
"People"	WA-01 WA-08	Rick White & Randy Tate *Rick White & Randy Tate*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressmen White and Tate: raise the minimum wage" *"Call Rep. White and Tate – [800-number]"*	5/20/98-6/23/98	9/17/98	11/5/98	☐	☐
"People"	WA-04	Doc Hastings *Doc Hastings*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressmen Hastings: raise the minimum wage" *"Call Rep. Hastings – [800-number]"*	5/20/98-6/23/98	9/17/98	11/5/98	☐	☐
"People"	TN-04	Van Hilleary *Van Hilleary*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressmen Hilleary: raise the minimum wage" *"Call Rep. Hilleary – [800-number]"*	5/20/98-6/23/98	8/1/98	11/5/98	☐	☐
"People"	MI-08	Dick Chrysler *Dick Chrysler*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressmen Chrysler: raise the minimum wage" *"Call Rep. Chrysler – [800-number]"*	5/20/98-6/23/98	8/5/98	11/5/98	☐	☐
"People"	WA-06	George Nethercutt *George Nethercutt*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressmen Nethercutt: raise the minimum wage" *"Call Rep. Nethercutt – [800-number]"*	5/20/98-6/23/98	9/17/98	11/5/98	☐	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates *Broadcast*	*Primary*	*General Election*	Broadcast within... *30 Days of Primary?*	*60 Days of General Election?*
"People"	NC-02 NC-04	David Funderburk & Fred Heineman *David Funderburk & Fred Heineman*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressmen Funderburk and Heineman: raise the minimum wage" *"Call Rep. Funderburk and Heineman – [800-number]"*	5/20/98-6/23/98	9/7/98	11/5/98	☐	☐
"People"	IN-08	John Hostettler *John Hostettler*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressman Hostettler: raise the minimum wage" *"Call Rep. Hostettler – [800-number]"*	5/20/98-6/23/98	5/7/98	11/5/98	☐	☐
"People"	IA-04	Greg Ganske *Greg Ganske*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressman Ganske: raise the minimum wage" *"Call Rep. Ganske – [800-number]"*	5/20/98-6/23/98	6/4/98	11/5/98	☐	☐
"People"	KS-04	Todd Tiahrt *Todd Tiahrt*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressman Tiahrt: raise the minimum wage" *"Call Rep. Tiahrt – [800-number]"*	5/20/98-6/23/98	8/4/98	11/5/98	☐	☐
"People"	KY-01	Edward Whitfield *Edward Whitfield*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressman Whitfield: raise the minimum wage" *"Call Rep. Whitfield – [800-number]"*	5/20/98-6/23/98	5/26/98	11/5/98	☑	☐
"People"	ME-01	James Longley *James Longley*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressman Longley: raise the minimum wage" *"Call Rep. Longley – [800-number]"*	5/20/98-6/23/98	9/17/98	11/5/98	☐	☐
"People"	NE-02	Jon Christensen *John Christensen*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressman Christensen: raise the minimum wage" *"Call Rep. Christensen – [800-number]"*	5/20/98-6/23/98	5/14/98	11/5/98	☐	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Stressed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"Couple"	NY-25	Jim Walsh & Newt Gingrich *Jim Walsh & Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now Congress is preparing to vote again on drastic cuts in Medicare. Call Jim Walsh and tell him not to destroy Medicare. Tell him, this time, we're watching." *"Tell Congressman Walsh not to destroy Medicare. Call [800-number]."*	8/27/98-7/23/98; 7/11/98-7/19/98	9/10/98	11/5/98	☐	☐
"Couple"	OH-08	Frank Cremeans & Newt Gingrich *Frank Cremeans & Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now Congress is preparing to vote again on drastic cuts in Medicare. Call Frank Cremeans and tell him not to destroy Medicare. Tell him, this time, we're watching." *"Tell Congressman Cremeans not to destroy Medicare. Call [800-number]."*	8/27/98-7/23/98; 7/11/98-7/19/98	9/15/98	11/5/98	☐	☐
"Couple"	OH-10	Martin Hoke & Newt Gingrich *Martin Hoke & Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now Congress is preparing to vote again on drastic cuts in Medicare. Call Martin Hoke and tell him not to destroy Medicare. Tell him, this time, we're watching." *"Tell Congressman Hoke not to destroy Medicare. Call [800-number]."*	8/27/98-7/23/98; 7/11/98-7/19/98	9/15/98	11/5/98	☐	☐
"Couple"	OH-02	Tom Coburn & Newt Gingrich *Tom Coburn & Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now Congress is preparing to vote again on drastic cuts in Medicare. Call Tom Coburn and tell him not to destroy Medicare. Tell him, this time, we're watching." *"Tell Congressman Coburn not to destroy Medicare. Call [800-number]."*	8/27/98-7/23/98; 7/11/98-7/19/98	8/27/98	11/5/98	☐	☐
"Couple"	OH-05	Jim Burns & Newt Gingrich *Jim Burns & Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now Congress is preparing to vote again on drastic cuts in Medicare. Call Jim Burns and tell him not to destroy Medicare. Tell him, this time, we're watching." *"Tell Congressman Burns not to destroy Medicare. Call [800-number]."*	8/27/98-7/23/98; 7/11/98-7/19/98	9/21/98	11/5/98	☐	☐
"Couple"	TX-08	Steve Stockman & Newt Gingrich *Steve Stockman & Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now Congress is preparing to vote again on drastic cuts in Medicare. Call Steve Stockman and tell him not to destroy Medicare. Tell him, this time, we're watching." *"Tell Congressman Stockman not to destroy Medicare. Call [800-number]."*	8/27/98-7/23/98; 7/11/98-7/19/98	3/12/98	11/5/98	☐	☐
"Couple"	GA-08	Saxby Chambliss & Newt Gingrich *Saxby Chambliss & Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now Congress is preparing to vote again on drastic cuts in Medicare. Call Saxby Chambliss and tell him not to destroy Medicare. Tell him, this time, we're watching." *"Tell Congressman Chambliss not to destroy Medicare. Call [800-number]."*	7/10/98-7/19/98	7/9/98	11/5/98	☐	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Stressed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"People"	CA-01	Frank Riggs *Frank Riggs*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressman Riggs: raise the minimum wage" *"Call Rep. Riggs – [800-number]"*	5/20/98-6/23/98	3/26/98	11/5/98	☐	☐
"People"	OH-05	Frank Cremeans *Frank Cremeans*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressman Cremeans: raise the minimum wage" *"Call Rep. Cremeans – [800-number]"*	5/20/98-6/23/98	3/19/98	11/5/98	☐	☐
"People"	CA-22	Andrea Seastrand *Andrea Seastrand*	☐	Minimum Wage; Medicare Funding; Education Funding; Tax Fairness	"Tell Congresswoman Seastrand: raise the minimum wage" *"Call Rep. Andrea Seastrand – [800-number]"*	5/20/98-6/23/98	3/26/98	11/5/98	☐	☐
"People"	GA-08	Saxby Chambliss *Saxby Chambliss*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressman Chambliss: raise the minimum wage" *"Call Rep. Chambliss – [800-number]"*	5/20/98-6/23/98	7/9/98	11/5/98	☐	☐
"People"	GA-10	Charlie Norwood *Charlie Norwood*	☐	Health & Safety; Medicare Funding; Education Funding; Tax Fairness	"Tell Congressman Norwood: raise the minimum wage" *"Call Rep. Norwood – [800-number]"*	5/20/98-6/23/98	7/9/98	11/5/98	☐	☐
"Couple"	CT-06	Gary Franks & Newt Gingrich *Gary Franks & Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now Congress is preparing to vote again on drastic cuts in Medicare. Call Gary Franks and tell him not to destroy Medicare. Tell him, this time, we're watching." *"Tell Congressman Franks not to destroy Medicare. Call [800-number]."*	7/10/98-7/19/98	9/10/98	11/5/98	☐	☐
"Couple"	NV-01	John Ensign & Newt Gingrich *John Ensign & Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now Congress is preparing to vote again on drastic cuts in Medicare. Call John Ensign and tell him not to destroy Medicare. Tell him, this time, we're watching." *"Tell Congressman Ensign not to destroy Medicare. Call [800-number]."*	8/27/98-7/23/98; 7/11/98-7/19/98	9/3/98	11/5/98	☐	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type Pictured in *italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type Video in *italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Couple"	WI-01	Mark Neumann & Newt Gingrich *Mark Neumann & Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now Congress is preparing to vote again on drastic cuts in Medicare. Call Mark Neumann and tell him not to destroy Medicare. Tell him, this time, we're watching." *"Tell Congressman Neumann not to destroy Medicare. Call [800-number]."*	6/27/98-7/20/98	9/10/98	11/3/98	☐	☐
"Whither"	NY-26	Jim Walsh & Newt Gingrich *Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now comes another vote. They're after Medicare again." *"Call Congressman Walsh – [800-number]"*	7/20/98-8/4/98	9/10/98	11/3/98	☐	☐
"Whither"	WA-04	Doc Hastings & Newt Gingrich *Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now comes another vote. They're after Medicare again." *"Call Congressman Hastings – [800-number]"*	7/20/98-8/4/98	9/17/98	11/3/98	☐	☐
"Whither"	WA-01 WA-09	Rick White, Randy Tate, & Newt Gingrich *Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now comes another vote. They're after Medicare again." *"Call Congressmen White and Tate – [800-number]"*	7/20/98-8/4/98	9/17/98	11/3/98	☐	☐
"Whither"	TX-09	Steve Stockman & Newt Gingrich *Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now comes another vote. They're after Medicare again." *"Call Congressman Stockman – [800-number]"*	7/20/98-8/4/98	9/12/98	11/3/98	☐	☐
"Whither"	AZ-05	J.D. Hayworth & Newt Gingrich *Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now comes another vote. They're after Medicare again." *"Call Congressman Hayworth – [800-number]"*	7/20/98-8/4/98	9/10/98	11/3/98	☐	☐
"Whither"	OR-05	Jim Bunn & Newt Gingrich *Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now comes another vote. They're after Medicare again." *"Call Congressman Bunn – [800-number]"*	7/20/98-8/4/98	8/21/98	11/3/98	☐	☐
"Whither"	OK-02	Tom Coburn & Newt Gingrich *Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now comes another vote. They're after Medicare again." *"Call Congressman Coburn – [800-number]"*	7/20/98-8/4/98	8/27/98	11/3/98	☑	☐
"Whither"	WA-05	George Nethercutt & Newt Gingrich *Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now comes another vote. They're after Medicare again." *"Call Congressman Nethercutt – [800-number]"*	7/20/98-8/4/98	9/17/98	11/3/98	☐	☐
"Whither"	NY-01	John Envign & Newt Gingrich *Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now comes another vote. They're after Medicare again." *"Call Congressman Envign – [800-number]"*	7/20/98-8/4/98	9/3/98	11/3/98	☑	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type Pictured in *italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type Video in *italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Couple"	CA-22	Andrea Seastrand & Newt Gingrich *Andrea Seastrand & Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now Congress is preparing to vote again on drastic cuts in Medicare. Call Andrea Seastrand and tell her not to destroy Medicare. Tell her, this time, we're watching." *"Tell Congresswoman Seastrand not to destroy Medicare. Call [800-number]."*	7/10/98-7/19/98	3/26/98	11/3/98	☐	☐
"Couple"	KS-04	Todd Tiahrt & Newt Gingrich *Todd Tiahrt & Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now Congress is preparing to vote again on drastic cuts in Medicare. Call Todd Tiahrt and tell him not to destroy Medicare. Tell him, this time, we're watching." *"Tell Congressman Tiahrt not to destroy Medicare. Call [800-number]."*	7/10/98-7/19/98	8/4/98	11/3/98	☑	☐
"Couple"	GA-10	Charlie Norwood & Newt Gingrich *Charlie Norwood & Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now Congress is preparing to vote again on drastic cuts in Medicare. Call Charlie Norwood and tell him not to destroy Medicare. Tell him, this time, we're watching." *"Tell Congressman Norwood not to destroy Medicare. Call [800-number]."*	7/10/98-7/19/98	7/9/98	11/3/98	☐	☐
"Couple"	NE-02	Jon Christensen & Newt Gingrich *John Christensen & Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now Congress is preparing to vote again on drastic cuts in Medicare. Call Jon Christensen and tell him not to destroy Medicare. Tell him, this time, we're watching." *"Tell Congressman Christensen not to destroy Medicare. Call [800-number]."*	7/10/98-7/19/98	5/14/98	11/3/98	☐	☐
"Couple"	IN-09	John Hostettler & Newt Gingrich *John Hostettler & Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now Congress is preparing to vote again on drastic cuts in Medicare. Call John Hostettler and tell him not to destroy Medicare. Tell him, this time, we're watching." *"Tell Congressman Hostettler not to destroy Medicare. Call [800-number]."*	7/10/98-7/19/98; 7/11/98-7/19/98	5/7/98	11/3/98	☐	☐
"Couple"	OH-01	Steve Chabot & Newt Gingrich *Steve Chabot & Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now Congress is preparing to vote again on drastic cuts in Medicare. Call Steve Chabot and tell him not to destroy Medicare. Tell him, this time, we're watching." *"Tell Congressman Chabot not to destroy Medicare. Call [800-number]."*	7/10/98-7/19/98	3/10/98	11/3/98	☐	☐
"Couple"	MI-08	Dick Chrysler & Newt Gingrich *Dick Chrysler & Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now Congress is preparing to vote again on drastic cuts in Medicare. Call Dick Chrysler and tell him not to destroy Medicare. Tell him, this time, we're watching." *"Tell Congressman Chrysler not to destroy Medicare. Call [800-number]."*	6/27/98-7/20/98; 7/11/98-7/19/98	8/4/98	11/3/98	☑	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type Pictured in italic type	Radio?	Issue(s) Discussed	Call to Action Audio in normal type Video in italic type	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"Couple"	WA-05	George Nethercutt & Newt Gingrich *George Nethercutt & Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now Congress is preparing to vote again on drastic cuts in Medicare. Call George Nethercutt and tell him not to destroy Medicare. Tell him this time, we're watching." *"Tell Congressman Nethercutt not to destroy Medicare. Call [800-number]."*	6/27/96-7/20/96; 7/11/96-7/19/96	9/17/96	11/5/96	☐	☐
"Couple"	MA-03	Peter Blute & Newt Gingrich *Peter Blute & Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now Congress is preparing to vote again on drastic cuts in Medicare. Call Peter Blute and tell him not to destroy Medicare. Tell him, this time, we're watching." *"Tell Congressman Blute not to destroy Medicare. Call [800-number]."*	6/27/96-7/20/96; 7/11/96-7/19/96	9/17/96	11/5/96	☐	☐
"Whither"	OH-10 OH-19	Martin Hoke, Steve Latourette & Newt Gingrich *Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now comes another vote. They're after Medicare again." *"Call Congressmen Hoke and Latourette – [800-number]"*	7/20/96-8/4/96	3/19/96	11/5/96	☐	☐
"Whither"	ID-01	Helen Chenoweth & Newt Gingrich *Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now comes another vote. They're after Medicare again." *"Call Congresswoman Chenoweth – [800-number]"*	7/20/96-8/4/96	5/28/96	11/5/96	☐	☐
"Whither"	CA-01	Frank Riggs & Newt Gingrich *Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now comes another vote. They're after Medicare again." *"Call Congressman Riggs – [800-number]"*	7/20/96-8/4/96	3/26/96	11/5/96	☐	☐
"Lady"	ID-01	Helen Chenoweth & Newt Gingrich *Helen Chenoweth & Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now Congress is preparing to vote again on drastic cuts in Medicare. Call Helen Chenoweth and tell her not to destroy Medicare. Tell her this time we're watching" viz: *"Tell Congresswoman Chenoweth not to destroy Medicare. Call [800 number]"*	6/27/96-7/20/96; 7/11/96-7/19/96	5/28/96	11/5/96	☐	☐
"Whither"	CA-22	Andrea Seastrand & Newt Gingrich *Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now comes another vote. They're after Medicare again." *"Call Congresswoman Seastrand – [800-number]"*	7/20/96-8/4/96	3/26/96	11/5/96	☐	☐
"Whither"	IA-04	Greg Ganske & Newt Gingrich *Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now comes another vote. They're after Medicare again." *"Call Congressman Ganske – [800-number]"*	7/20/96-8/4/96	6/4/96	11/5/96	☐	☐
"Whither"	IN-09	John Hostettler & Newt Gingrich *Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now comes another vote. They're after Medicare again." *"Call Congressman Hostettler – [800-number]"*	7/20/96-8/4/96; 7/20/96-8/4/96	5/7/96	11/5/96	☐	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type Pictured in italic type	Radio?	Issue(s) Discussed	Call to Action Audio in normal type Video in italic type	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"Whither"	NC-02 NC-04	David Funderburk, Fred Heineman, & Newt Gingrich *Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now comes another vote. They're after Medicare again." *"Call Congressmen Funderburk and Heineman – [800-number]"*	7/20/96-8/4/96	5/7/96	11/5/96	☐	☐
"Couple"	ME-01	James Longley & Newt Gingrich *James Longley & Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now Congress is preparing to vote again on drastic cuts in Medicare. Call James Longley and tell him not to destroy Medicare. Tell him, this time, we're watching." *"Tell Congressman Longley not to destroy Medicare. Call [800-number]."*	6/27/96-7/20/96; 7/11/96-7/19/96	9/11/96	11/5/96	☐	☐
"Couple"	WA-04	Doc Hastings & Newt Gingrich *Doc Hastings & Newt Gingric*	☐	Medicare Funding; Tax Fairness	"Now Congress is preparing to vote again on drastic cuts in Medicare. Call Doc Hastings and tell him not to destroy Medicare. Tell him, this time, we're watching." *"Tell Congressman Hastings not to destroy Medicare. Call [800-number]."*	7/10/96-7/19/96	9/17/96	11/5/96	☐	☐
"Whither"	NE-01	Jon Christensen & Newt Gingrich *Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now comes another vote. They're after Medicare again." *"Call Congressman Christensen – [800-number]"*	7/20/96-8/4/96	5/14/96	11/5/96	☐	☐
"Couple"	AZ-06	J. D. Hayworth & Newt Gingrich *J. D. Hayworth & Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now Congress is preparing to vote again on drastic cuts in Medicare. Call J.D. Hayworth and tell him not to destroy Medicare. Tell him, this time, we're watching." *"Tell Congressman Hayworth not to destroy Medicare. Call [800-number]."*	6/27/96-7/20/96; 7/11/96-7/19/96	9/10/96	11/5/96	☐	☐
"Lady"	KY-01	Edward Whitfield & Newt Gingrich *Edward Whitfield & Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now Congress is preparing to vote again on drastic cuts in Medicare. Call Edward Whitfield and tell him not to destroy Medicare. Tell him this time we're watching" viz: *"Tell Congressman Whitfield not to destroy Medicare. Call [800-number]"*	6/27/96-7/20/96; 7/11/96-7/19/96	5/28/96	11/5/96	☐	☐
"Lady"	IA-04	Greg Ganske & Newt Gingrich *Greg Ganske & Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now Congress is preparing to vote again on drastic cuts in Medicare. Call Ganske and tell him not to destroy Medicare. Tell him this time we're watching." *"Tell Congressman Ganske not to destroy Medicare. Call [800-number]"*	6/27/96-7/20/96; 7/11/96-7/19/96	6/4/96	11/5/96	☐	☐
"Couple"	CA-01	Frank Riggs & Newt Gingrich *Frank Riggs & Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now Congress is preparing to vote again on drastic cuts in Medicare. Call Frank Riggs and tell him not to destroy Medicare. Tell him, this time, we're watching." *"Tell Congressman Riggs not to destroy Medicare. Call [800-number]."*	6/27/96-7/20/96; 7/11/96-7/19/96	3/26/96	11/5/96	☐	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates *Broadcast*	*Primary*	*General Election*	Broadcast within... *30 Days of Primary?*	*60 Days of General Election?*
"$5.15"	CA-22	Andrea Seastrand *Andrea Seastrand, footage of dozens of members of Congress*	☐	Minimum Wage	"Call Congresswoman Seastrand. Tell her it is time to start rewarding work. Tell her it's time to raise the minimum wage." *"Call Congresswoman Seastrand – [800-number]"*	6/29/98-7/8/98	3/28/98	11/6/98	☐	☐
"Couple"	MA-06	Peter Torkildsen & Newt Gingrich	☑	Medicare Funding; Tax Fairness	"Now Congress is preparing to vote again on drastic cuts in Medicare. Call XXX Torkildsen and tell him not to destroy Medicare. Tell him, this time, we're watching."	6/27/98-7/20/98; 7/11/98-7/19/98	9/17/98	11/6/98	☐	☐
"Couple"	PA-13	John Fox & Newt Gingrich	☑	Medicare Funding; Tax Fairness	"Now Congress is preparing to vote again on drastic cuts in Medicare. Call XXX Fox and tell him not to destroy Medicare. Tell him, this time we're watching."	6/27/98-7/20/98; 7/11/98-7/19/98	4/23/98	11/6/98	☐	☐
"$5.15"	OH-01	Steve Chabot *Steve Chabot, footage of dozens of members of Congress*	☐	Minimum Wage	"Call Congressman Chabot. Tell him it is time to start rewarding our Tell him it's time to raise the minimum wage." *"Call Congressman Chabot – [800-number]"*	6/29/98-7/8/98	3/19/98	11/6/98	☐	☐
"$5.15"	WA-01	Rick White *Rick White, footage of dozens of members of Congress*	☐	Minimum Wage	"Call Congressman White. Tell him it is time to start rewarding work. Tell him it's time to raise the minimum wage." *"Call Congressman White – [800-number]"*	6/29/98-7/8/98	9/17/98	11/6/98	☐	☐
"$5.15"	ME-02	Jon Christensen *John Christensen, footage of dozens of members of Congress*	☐	Minimum Wage	"Call Congressman Christensen. Tell him it is time to start rewarding work. Tell him it's time to raise the minimum wage." *"Call Congressman Christensen – [800-number]"*	6/29/98-7/8/98	9/14/98	11/6/98	☐	☐
"$5.15"	WA-04	Doc Hastings *Doc Hastings, footage of dozens of members of Congress*	☐	Minimum Wage	"Call Congressman Hastings. Tell him it is time to start rewarding work. Tell him it's time to raise the minimum wage." *"Call Congressman Hastings – [800-number]"*	6/29/98-7/8/98	9/17/98	11/6/98	☐	☐
"Peace"	PA-13	John Fox & Newt Gingrich	☑	Medicare Funding	"So call Congressman Fox. Tell him to keep his hands off medicare"	7/20/98-8/4/98	4/23/98	11/3/98	☐	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates *Broadcast*	*Primary*	*General Election*	Broadcast within... *30 Days of Primary?*	*60 Days of General Election?*
"Whither"	KS-04	Todd Tiahrt & Newt Gingrich *Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now comes another vote. They're after Medicare again." *"Call Congressman Tiahrt – [800-number]"*	7/20/98-8/4/98	8/4/98	11/3/98	☑	☐
"Whither"	MI-08	Dick Chrysler & Newt Gingrich *Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now comes another vote. They're after Medicare again." *"Call Congressman Chrysler – [800-number]"*	7/20/98-8/4/98	8/4/98	11/3/98	☑	☐
"Whither"	CT-05	Gary Franks & Newt Gingrich *Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now comes another vote. They're after Medicare again." *"Call Congressman Franks – [800-number]"*	7/20/98-8/4/98	9/10/98	11/3/98	☐	☐
"Couple"	NC-02 NC-04	David Funderburk & Fred Heineman & Newt Gingrich *David Funderburk, Fred Heineman, & Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now Congress is preparing to vote again on drastic cuts in Medicare. Call David Funderburk and Fred Heineman and tell them not to destroy Medicare. Tell him, this time, we're watching." *"Tell Congressmen Funderburk and Heineman not to destroy Medicare. Call [800-number]."*	7/10/98-7/19/98	5/7/98	11/3/98	☐	☐
"Whither"	KY-01	Edward Whitfield & Newt Gingrich *Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now comes another vote. They're after Medicare again." *"Call Congressman Whitfield – [800-number]"*	7/20/98-8/4/98	5/26/98	11/3/98	☐	☐
"Whither"	MS-01	James Longley & Newt Gingrich *Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now comes another vote. They're after Medicare again." *"Call Congressman Longley – [800-number]"*	7/20/98-8/4/98	8/11/98	11/3/98	☐	☐
"Whither"	MA-03	Peter Blute & Newt Gingrich *Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now comes another vote. They're after Medicare again." *"Call Congressman Blute – [800-number]"*	7/20/98-8/4/98	9/17/98	11/3/98	☐	☐
"Couple"	WA-01 WA-08	Rick White & Randy Tate & Newt Gingrich *Rick White, Randy Tate, & Newt Gingrich*	☐	Medicare Funding; Tax Fairness	"Now Congress is preparing to vote again on drastic cuts in Medicare. Call Rick White and Randy Tate and tell them not to destroy Medicare. Tell him, this time, we're watching." *"Tell Congressmen White and Tate not to destroy Medicare. Call [80 number]."*	7/10/98-7/19/98	9/17/98	11/3/98	☐	☐
"Peace"	MA-03 MA-06	Peter Blute, Peter Torkildsen & Newt Gingrich	☑	Medicare Funding	"So call Congressmen Blute and Torkildsen. Tell them to keep their hands off medicare"	7/20/98-8/4/98	9/17/98	11/3/98	☐	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type Pictured in italic type	Radio?	Issue(s) Discussed	Call to Action Audio in normal type Video in italic type	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"$5.15"	NC-04	Fred Heineman *Fred Heineman, footage of dozens of members of Congress*	☐	Minimum Wage	"Call Congressman Heineman. Tell him it is time to start rewarding work. Tell him it's time to raise the minimum wage." "Call Congressman Heineman – [800-number]"	6/25/96-7/8/96	9/7/96	11/5/96	☐	☐
"$5.15"	IN-08	John Hostettler *John Hostettler, footage of dozens of members of Congress*	☐	Minimum Wage	"Call Congressman Hostettler. Tell him it is time to start rewarding work. Tell him it's time to raise the minimum wage." "Call Congressman Hostettler – [800-number]"	6/25/96-7/8/96	9/7/96	11/5/96	☐	☐
"$5.15"	WA-08	Randy Tate *Randy Tate, footage of dozens of members of Congress*	☐	Minimum Wage	"Call Congressman Tate. Tell him it is time to start rewarding work. Tell him it's time to raise the minimum wage." "Call Congressman Tate – [800-number]"	6/25/96-7/8/96	9/17/96	11/5/96	☐	☐
"Pelosi"	MA-05	Peter Blute & Newt Gingrich	☑	Medicare Funding	"So call Congressman Blute. Tell him to keep his hands off medicare	7/25/96-8/4/96	9/17/96	11/5/96	☐	☐
"$5.15"	NC-02	David Funderburk *David Funderburk, footage of dozens of members of Congress*	☐	Minimum Wage	"Call Congressman Funderburk. Tell him it is time to start rewarding work. Tell him it's time to raise the minimum wage." "Call Congressman Funderburk – [800-number]"	6/25/96-7/8/96	9/7/96	11/5/96	☐	☐
"Pelosi"	CA-01	Frank Riggs & Newt Gingrich	☑	Medicare Funding	"So call Congressman Riggs. Tell him to keep his hands off medicar	7/25/96-8/4/96	9/26/96	11/5/96	☐	☐
"$5.15"	CT-06	Gary Franks *Gary Franks, footage of dozens of members of Congress*	☐	Minimum Wage	"Call Congressman Franks. Tell him it is time to start rewarding work. Tell him it's time to raise the minimum wage." "Call Congressman Franks – [800-number]"	6/25/96-7/8/96	9/10/96	11/5/96	☐	☐
"Couple"	MA-03	Peter Blute & Newt Gingrich	☑		"Now Congress is preparing to vote again on drastic cuts in Medicare. Call Peter Blute and tell him not to destroy Medicare. Tell him, this time, we're watching."	8/27/96-7/25/96; 7/11/96-7/19/96	9/17/96	11/5/96	☐	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type Pictured in italic type	Radio?	Issue(s) Discussed	Call to Action Audio in normal type Video in italic type	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"$5.15"	NC-04	Fred Heineman *Fred Heineman, footage of dozens of members of Congress*	☐	Minimum Wage	"Call Congressman Heineman. Tell him it is time to start rewarding work. Tell him it's time to raise the minimum wage." "Call Congressman Heineman – [800-number]"	6/25/96-7/8/96	9/7/96	11/5/96	☐	☐
"$5.15"	IN-08	John Hostettler *John Hostettler, footage of dozens of members of Congress*	☐	Minimum Wage	"Call Congressman Hostettler. Tell him it is time to start rewarding work. Tell him it's time to raise the minimum wage." "Call Congressman Hostettler – [800-number]"	6/25/96-7/8/96	9/7/96	11/5/96	☐	☐
"$5.15"	WA-08	Randy Tate *Randy Tate, footage of dozens of members of Congress*	☐	Minimum Wage	"Call Congressman Tate. Tell him it is time to start rewarding work. Tell him it's time to raise the minimum wage." "Call Congressman Tate – [800-number]"	6/25/96-7/8/96	9/17/96	11/5/96	☐	☐
"Pelosi"	MA-05	Peter Blute & Newt Gingrich	☑	Medicare Funding	"So call Congressman Blute. Tell him to keep his hands off medicare	7/25/96-8/4/96	9/17/96	11/5/96	☐	☐
"$5.15"	NC-02	David Funderburk *David Funderburk, footage of dozens of members of Congress*	☐	Minimum Wage	"Call Congressman Funderburk. Tell him it is time to start rewarding work. Tell him it's time to raise the minimum wage." "Call Congressman Funderburk – [800-number]"	6/25/96-7/8/96	9/7/96	11/5/96	☐	☐
"Pelosi"	CA-01	Frank Riggs & Newt Gingrich	☑	Medicare Funding	"So call Congressman Riggs. Tell him to keep his hands off medicar	7/25/96-8/4/96	9/26/96	11/5/96	☐	☐
"$5.15"	CT-06	Gary Franks *Gary Franks, footage of dozens of members of Congress*	☐	Minimum Wage	"Call Congressman Franks. Tell him it is time to start rewarding work. Tell him it's time to raise the minimum wage." "Call Congressman Franks – [800-number]"	6/25/96-7/8/96	9/10/96	11/5/96	☐	☐
"Couple"	MA-03	Peter Blute & Newt Gingrich	☑		"Now Congress is preparing to vote again on drastic cuts in Medicare. Call Peter Blute and tell him not to destroy Medicare. Tell him, this time, we're watching."	8/27/96-7/25/96; 7/11/96-7/19/96	9/17/96	11/5/96	☐	☐

506

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Minimum Wage"	ME-Sen	Olympia Snowe & Bill Cohen	☑		"Both of our Senators, Olympia Snowe and Bill Cohen, are undecided about the minimum wage, so call them at [800-number]. Tell them to raise the minimum wage. No exceptions. No excuses. [800-number]"	7/5/98-7/5/98	6/11/98	11/3/98	☐	☐
"Minimum Wage"	VT-Sen	Jim Jeffords	☑		"Our Senator, Jim Jeffords, is undecided about the minimum wage, s call him at [800-number]. Tell him to raise the minimum wage. No exceptions. No excuses. [800-number]"	7/5/98-7/5/98	9/10/98	11/3/98	☐	☐
"Couple"	IN-08	John Hostettler & Newt Gingrich	☑		"Now Congress is preparing to vote again on drastic cuts in Medicare Call John Hostettler and tell him not to destroy Medicare. Tell him, th time, we're watching."	7/10/98-7/10/98; 7/11/98-7/15/98	5/7/98	11/3/98	☐	☐
"Couple"	NC-02 NC-04	David Funderburk & Fred Heineman & Newt Gingrich	☑		"Now Congress is preparing to vote again on drastic cuts in Medicare Call David Funderburk and Fred Heineman and tell them not to dest Medicare. Tell them, this time, we're watching."	7/10/98-7/10/98	5/7/98	11/3/98	☐	☐
"Couple"	GA-10	Charlie Norwood & Newt Gingrich	☑		"Now Congress is preparing to vote again on drastic cuts in Medicare Call Charlie Norwood and tell him not to destroy Medicare. Tell him, this time, we're watching."	7/10/98-7/10/98	7/9/98	11/3/98	☐	☐
"Couple"	GA-08	Saxby Chambliss & Newt Gingrich	☑		"Now Congress is preparing to vote again on drastic cuts in Medicare Call Saxby Chambliss and tell him not to destroy Medicare. Tell him, thi time, we're watching."	7/10/98-7/10/98	7/9/98	11/3/98	☐	☐
"Whither"	IN-08	John Hostettler & Newt Gingrich	☑		"Now comes another vote. They're after Medicare again."	7/20/98-8/4/98; 7/20/98-8/4/98	5/7/98	11/3/98	☐	☐
"Whither"	KY-01	Edward Whitfield & Newt Gingrich	☑		"Now comes another vote. They're after Medicare again."	7/20/98-8/4/98	5/26/98	11/3/98	☐	☐
"Whither"	NC-02 NC-04	David Funderburk, Fred Heineman, & Newt Gingrich	☑		"Now comes another vote. They're after Medicare again."	7/20/98-8/4/98	5/7/98	11/3/98	☐	☐

505

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Lady"	IA-04	Greg Ganske & Newt Gingrich	☑		"Now Congress is preparing to vote again on drastic cuts in Medicare Call Greg Ganske and tell him not to destroy Medicare. Tell him this time we're watching."	6/27/98-7/20/98; 7/11/98-7/15/98	6/4/98	11/3/98	☐	☐
"Couple"	CA-01	Frank Riggs & Newt Gingrich	☑		"Now Congress is preparing to vote again on drastic cuts in Medicare Call Frank Riggs and tell him not to destroy Medicare. Tell him, this time, we're watching."	6/27/98-7/20/98; 7/11/98-7/15/98	3/26/98	11/3/98	☐	☐
"Lady"	KY-01	Edward Whitfield & Newt Gingrich	☑		"Now Congress is preparing to vote again on drastic cuts in Medicare Call Edward Whitfield and tell him not to destroy Medicare. Tell him this time we're watching."	6/27/98-7/20/98; 7/11/98-7/15/98	5/26/98	11/3/98	☐	☐
"Couple"	TX-08	Steve Stockman & Newt Gingrich	☑		"Now Congress is preparing to vote again on drastic cuts in Medicare Call Steve Stockman and tell him not to destroy Medicare. Tell him, this time, we're watching."	6/27/98-7/20/98; 7/11/98-7/15/98	3/12/98	11/3/98	☐	☐
"$5.15"	KS-04	Todd Tiahrt *Todd Tiahrt, footage of dozens of members of Congress*	☐	Minimum Wage	"Call Congressman Tiahrt. Tell him it is time to start rewarding work. Tell him it's time to raise the minimum wage." *"Call Congressman Tiahrt – [800-number]"*	6/29/98-7/6/98	8/4/98	11/3/98	☑	☐
"$5.15"	IN-08	John Hostettler	☑		"Call Congressman Hostettler. Tell him it is time to start rewarding work. Tell him it's time to raise the minimum wage."	6/29/98-7/6/98	5/7/98	11/3/98	☐	☐
"$5.15"	NC-02	David Funderburk	☑		"Call Congressman Funderburk. Tell him it is time to start rewarding work. Tell him it's time to raise the minimum wage."	6/29/98-7/6/98	5/7/98	11/3/98	☐	☐
"$5.15"	NC-04	Fred Heineman	☑		"Call Congressman Heineman. Tell him it is time to start rewarding work. Tell him it's time to raise the minimum wage."	6/29/98-7/6/98	5/7/98	11/3/98	☐	☐
"Minimum Wage"	SD-Sen	Larry Pressler	☑		"Our Senator, Larry Pressler, is undecided about the minimum wage, so call him at [800-number]. Tell him to raise the minimum wage. No exceptions. No excuses. [800-number]"	7/5/98-7/5/98	6/4/98	11/3/98	☐	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

		Officeholder/Candidate			Call to Action	Dates			Broadcast within...	
Title	*District*	*Named in normal type Pictured in italic type*	*Radio?*	*Issue(s) Discussed*	*Audio in normal type Video in italic type*	*Broadcast*	*Primary*	*General Election*	*30 Days of Primary?*	*60 Days of General Election?*
"Exile"	MI-08	Dick Chrysler	☐	Pension Security/Pension Security/Pension Security	"Tell Chrysler to put the law on our side." "Call Congressman Chrysler [800-number]"	8/7/98-8/20/98	8/6/98	11/3/98	☐	☐
"Exile"	CT-06	Gary Franks	☐	Pension Security	"Tell Franks to put the law on our side." "Call Congressman Franks [800-number]"	8/7/98-8/20/98	9/10/98	11/3/98	☑	☐
"Exile"	WA-04	Doc Hastings	☐	Pension Security	"Tell Hastings to put the law on our side." "Call Congressman Hastings [800-number]"	8/7/98-8/20/98	9/17/98	11/3/98	☑	☐
"Exile"	AZ-06	J.D. Hayworth	☐	Pension Security	"Tell Hayworth to put the law on our side." "Call Congressman Hayworth [800-number]"	8/7/98-8/20/98	9/10/98	11/3/98	☑	☐
"Exile"	KS-04	Todd Tiahrt	☐	Pension Security	"Tell Tiahrt to put the law on our side." "Call Congressman Tiahrt [800-number]"	8/7/98-8/20/98	8/4/98	11/3/98	☐	☐
"Exile"	TX-06	Steve Stockman	☐	Pension Security	"Tell Stockman to put the law on our side." "Call Congressman Stockman [800-number]"	8/7/98-8/20/98	3/12/98	11/3/98	☐	☐
"Exile"	CA-22	Andrea Seastrand	☐	Pension Security	"Tell Seastrand to put the law on our side." "Call Congresswoman Seastrand [800-number]"	8/7/98-8/20/98	3/26/98	11/3/98	☐	☐
"Exile"	CA-01	Frank Riggs	☐	Pension Security	"Tell Riggs to put the law on our side." "Call Congressman Riggs [800-number]"	8/7/98-8/20/98	3/26/98	11/3/98	☐	☐
"Exile"	WA-08	George Nethercutt	☐	Pension Security	"Tell Nethercutt to put the law on our side." "Call Congressman Nethercutt [800-number]"	8/7/98-8/20/98	9/17/98	11/3/98	☑	☐
"Exile"	GA-10	Charlie Norwood	☐	Pension Security	"Tell Norwood to put the law on our side." "Call Congressman Norwood [800-number]"	8/7/98-8/20/98	7/8/98	11/3/98	☐	☐
"Exile"	NC-04	Fred Heineman	☐	Pension Security	"Tell Heineman to put the law on our side." "Call Congressman Heineman [800-number]"	8/7/98-8/20/98	5/7/98	11/3/98	☐	☐
"Exile"	ME-01	James Longley	☐	Pension Security	"Tell Longley to put the law on our side." "Call Congressman Longley [800-number]"	8/7/98-8/20/98	6/11/98	11/3/98	☐	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

		Officeholder/Candidate			Call to Action	Dates			Broadcast within...	
Title	*District*	*Named in normal type Pictured in italic type*	*Radio?*	*Issue(s) Discussed*	*Audio in normal type Video in italic type*	*Broadcast*	*Primary*	*General Election*	*30 Days of Primary?*	*60 Days of General Election?*
"Whither"	AZ-06	J. D. Hayworth & Newt Gingrich	☑		"How comes another vote. They're after Medicare again."	7/20/98-8/4/98	9/10/98	11/3/98	☐	☐
"Exile"	PA-13	John Fox	☐		"Tell Fox to put the law on our side." "Call Congressman Fox [800-number]"	8/7/98-8/20/98	5/21/98	11/3/98	☐	☐
"Exile"	PA-13	John Fox	☑	Pension Security	"Tell Fox to pu the law on our side."	8/7/98-8/20/98	5/21/98	11/3/98	☐	☐
"Retirees"	MA-06	Peter TorKildsen & Newt Gingrich	☑	Pension Security	"So call Congressman TorKildsen. This time tell TorKildsen to put the law on our side, not the pension robbers"	8/7/98-8/20/98	9/17/98	11/3/98	☑	☐
"Exile"	WA-01	Rick White	☐	Pension Security	"Tell White to put the law on our side." "Call Congressman White [800-number]"	8/7/98-8/20/98	9/17/98	11/3/98	☑	☐
"Exile"	NY-25	Jim Walsh	☐	Pension Security	"Tell Walsh to put the law on our side." "Call Congressman Walsh [800-number]"	8/7/98-8/20/98	9/10/98	11/3/98	☑	☐
"Exile"	KY-01	Ed Whitfield	☐	Pension Security	"Tell Whitfield to put the law on our side." "Call Congressman Whitfield [800-number]"	8/7/98-8/20/98	5/26/98	11/3/98	☐	☐
"Exile"	MN-01	Gil Gutknecht	☐	Pension Security	"Tell Gutknecht to put the law on our side." "Call Congressman Gutknecht [800-number]"	8/7/98-8/20/98	9/10/98	11/3/98	☑	☐
"Exile"	IA-04	Greg Ganske	☐	Pension Security	"Tell Ganske to put the law on our side." "Call Congressman Ganske [800-number]"	8/7/98-8/20/98	6/4/98	11/3/98	☐	☐
"Exile"	NY-01	John Ensign	☐	Pension Security	"Tell Ensign to put the law on our side." "Call Congressman Ensign [800-number]"	8/7/98-8/20/98	9/3/98	11/3/98	☑	☐
"Exile"	OH-08	Frank Cremeans	☐	Pension Security	"Tell Cremeans to put the law on our side." "Call Congressman Cremeans [800-number]"	8/7/98-8/20/98	3/19/98	11/3/98	☐	☐
"Exile"	OH-02	Tom Coburn	☐	Pension Security	"Tell Coburn to put the law on our side." "Call Congressman Coburn [800-number]"	8/7/98-8/20/98	9/27/98	11/3/98	☑	☐

510

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Raiders"	IL-06	Michael Flanagan	☑	Pension Security	"So call Congressman Flanagan. This time tell Flanagan to put the tax on our side, not the pension raiders!"	8/7/98-8/20/98	3/10/98	11/3/98	☐	☐
"Raiders"	MA-08	Peter Torkildsen	☑	Pension Security	"So call Congressman Torkildsen. This time tell Torkildsen to put the tax on our side, not the pension raiders!"	8/7/98-8/20/98	9/17/98	11/3/98	☐	☐
"Edith"	CA-01	Frank Riggs	☑		"Tell Riggs to put the tax on our side."	8/7/98-8/20/98	3/26/98	11/3/98	☐	☐
"Edith"	IN-08	John Hostettler	☑		"Tell Hostettler to put the tax on our side."	8/7/98-8/20/98	5/7/98	11/3/98	☐	☐
"Edith"	MN-01	Gil Gutknecht	☑		"Tell Gutknecht to put the tax on our side."	8/7/98-8/20/98	9/10/98	11/3/98	☑	☐
"Edith"	NC-04	Fred Heineman	☑		"Tell Heineman to put the tax on our side."	8/7/98-8/20/98	5/7/98	11/3/98	☐	☐
"Edith"	NC-02	David Funderburk	☑		"Tell Funderburk to put the tax on our side."	8/7/98-8/20/98	5/7/98	11/3/98	☐	☐
"Edith"	KY-01	Ed Whitfield	☑		"Tell Whitfield to put the tax on our side."	8/7/98-8/20/98	5/26/98	11/3/98	☐	☐
"Edith"	GA-08	Saxby Chambliss	☑		"Tell Chambliss to put the tax on our side."	8/7/98-8/20/98	7/8/98	11/3/98	☐	☐
"Protect"	PA-13	John Fox	☐	Medicare Prescription Drug Benefit	"Tell Shame: quit putting special interests ahead of working families" *"Call Congressman Fox – [local telephone]"*	8/12/98-8/25/98	4/23/98	11/3/98	☐	☐
"Protect"	GA-08	Saxby Chambliss	☐	Medicare Prescription Drug Benefit	"Tell Chambliss: quit putting special interests ahead of working families". *"Call Congressman Chambliss – [local telephone]"*	8/12/98-8/25/98	7/8/98	11/3/98	☐	☐
"Another"	ID-01	Helen Chenoweth & Newt Gingrich	☐	Medicare Funding; Tax Fairness	"Tell Chenoweth we know the truth about his vote to cut our Medicare benefits. Another vote is coming. This time we'll be watching" *"Call Chenoweth – [800-number]"*	8/28/98-9/4/98	5/26/98	11/3/98	☐	☐

509

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Edith"	OH-10	Martin Hoke	☐	Pension Security	"Tell Hoke to put the tax on our side." *"Call Congressman Hoke [800-number]"*	8/7/98-8/20/98	3/10/98	11/3/98	☐	☐
"Edith"	IN-08	John Hostettler	☐	Pension Security	"Tell Hostettler to put the tax on our side." *"Call Congressman Hostettler [800-number]"*	8/7/98-8/20/98	5/7/98	11/3/98	☐	☐
"Edith"	WA-09	Randy Tate	☐	Pension Security	"Tell Tate to put the tax on our side." *"Call Congressman Tate [800-number]"*	8/7/98-8/20/98	9/17/98	11/3/98	☑	☐
"Edith"	NE-02	Jon Christensen	☐	Pension Security	"Tell Christensen to put the tax on our side." *"Call Congressman Christensen [800-number]"*	8/7/98-8/20/98	5/14/98	11/3/98	☐	☐
"Edith"	OH-01	Steve Chabot	☐	Pension Security	"Tell Chabot to put the tax on our side." *"Call Congressman Chabot [800-number]"*	8/7/98-8/20/98	3/10/98	11/3/98	☐	☐
"Edith"	ID-01	Helen Chenoweth	☐	Pension Security	"Tell Chenoweth to put the tax on our side." *"Call Congresswoman Chenoweth [800-number]"*	8/7/98-8/20/98	5/26/98	11/3/98	☐	☐
"Edith"	GA-08	Saxby Chambliss	☐	Pension Security	"Tell Chambliss to put the tax on our side." *"Call Congressman Chambliss [800-number]"*	8/7/98-8/20/98	7/8/98	11/3/98	☐	☐
"Edith"	OR-06	Jim Bunn	☐	Pension Security	"Tell Bunn to put the tax on our side." *"Call Congressman Bunn [800-number]"*	8/7/98-8/20/98	5/21/98	11/3/98	☐	☐
"Edith"	NH-02	Charles Bass	☐	Pension Security	"Tell Bass to put the tax on our side." *"Call Congressman Bass [800-number]"*	8/7/98-8/20/98	9/10/98	11/3/98	☑	☐
"Edith"	NC-02	David Funderburk	☐	Pension Security	"Tell Funderburk to put the tax on our side." *"Call Congressman Funderburk [800-number]"*	8/7/98-8/20/98	5/7/98	11/3/98	☐	☐
"Edith"	PA-13	John Fox	☑		"Tell Fox to put the tax on our side."	8/7/98-8/20/98	4/23/98	11/3/98	☐	☐
"Raiders"	PA-13	John Fox	☑	Pension Security	"So call Congressman Fox. This time, tell Fox to put the tax on our side, not the pension raiders."	8/7/98-8/20/98	4/23/98	11/3/98	☐	☐

512

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"Another"	NV-01	John Ensign & Newt Gingrich	☐	Medicare Funding; Tax Fairness	"Tell Ensign we know the truth about his vote to cut our Medicare benefits. Another vote is coming. This time we'll be watching" *"Call Ensign – [800-number]"*	8/28/98-9/4/98	9/2/98	11/3/98	☑	☐
"Another"	OH-08	Frank Cremeans & Newt Gingrich	☐	Medicare Funding; Tax Fairness	"Tell Cremeans we know the truth about his vote to cut our Medicare benefits. Another vote is coming. This time we'll be watching" *"Call Cremeans – [800-number]"*	8/28/98-9/4/98	3/10/98	11/3/98	☐	☐
"Another"	NY-35	Jim Walsh & Newt Gingrich	☐	Medicare Funding; Tax Fairness	"Tell Walsh we know the truth about his vote to cut our Medicare benefits. Another vote is coming. This time we'll be watching" *"Call Walsh – [800-number]"*	8/28/98-9/4/98	9/10/98	11/3/98	☑	☐
"Another"	CA-22	Andrea Seastrand & Newt Gingrich	☐	Medicare Funding; Tax Fairness	"Tell Seastrand we know the truth about her vote to cut our Medicare benefits. Another vote is coming. This time we'll be watching" *"Call Seastrand – [800-number]"*	8/28/98-9/4/98	3/26/98	11/3/98	☐	☐
"Another"	IA-04	Greg Ganske & Newt Gingrich	☐	Medicare Funding; Tax Fairness	"Tell Ganske we know the truth about his vote to cut our Medicare benefits. Another vote is coming. This time we'll be watching" *"Call Ganske – [800-number]"*	8/28/98-9/4/98	9/4/98	11/3/98	☐	☐
"Another"	OH-01	Steve Chabot & Newt Gingrich	☐	Medicare Funding; Tax Fairness	"Tell Chabot we know the truth about his vote to cut our Medicare benefits. Another vote is coming. This time we'll be watching" *"Call Chabot – [800-number]"*	8/28/98-9/4/98	3/10/98	11/3/98	☐	☐
"Another"	IN-08	John Hostettler & Newt Gingrich	☐	Medicare Funding; Tax Fairness	"Tell Hostettler we know the truth about his vote to cut our Medicare benefits. Another vote is coming. This time we'll be watching" *"Call Hostettler – [800-number]"*	8/28/98-9/4/98	5/7/98	11/3/98	☐	☐
"Another"	OH-10	Martin Hoke & Newt Gingrich	☐	Medicare Funding; Tax Fairness	"Tell Hoke we know the truth about his vote to cut our Medicare benefits. Another vote is coming. This time we'll be watching" *"Call Hoke – [800-number]"*	8/28/98-9/4/98	3/10/98	11/3/98	☐	☐
"Another"	NH-02	Charles Bass & Newt Gingrich	☐	Medicare Funding; Tax Fairness	"Tell Bass we know the truth about his vote to cut our Medicare benefits. Another vote is coming. This time we'll be watching" *"Call Bass – [800-number]"*	8/28/98-9/4/98	9/10/98	11/3/98	☑	☐
"Another"	OK-02	Tom Coburn & Newt Gingrich	☐	Medicare Funding; Tax Fairness	"Tell Coburn we know the truth about his vote to cut our Medicare benefits. Another vote is coming. This time we'll be watching" *"Call Coburn – [800-number]"*	8/28/98-9/4/98	8/27/98	11/3/98	☐	☐

511

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"Another"	GA-10	Charlie Norwood & Newt Gingrich	☐	Medicare Funding; Tax Fairness	"Tell Norwood we know the truth about his vote to cut our Medicare benefits. Another vote is coming. This time we'll be watching" *"Call Norwood – [800-number]"*	8/28/98-9/4/98	7/6/98	11/3/98	☐	☐
"Another"	TX-08	Steve Stockman & Newt Gingrich	☐	Medicare Funding; Tax Fairness	"Tell Stockman we know the truth about his vote to cut our Medicare benefits. Another vote is coming. This time we'll be watching" *"Call Stockman – [800-number]"*	8/28/98-9/4/98	3/12/98	11/3/98	☐	☐
"Another"	WA-01	Rick White & Newt Gingrich	☐	Medicare Funding; Tax Fairness	"Tell White we know the truth about his vote to cut our Medicare benefits. Another vote is coming. This time we'll be watching" *"Call White – [800-number]"*	8/28/98-9/4/98	9/17/98	11/3/98	☑	☐
"Another"	WA-08	George Nethercutt & Newt Gingrich	☐	Medicare Funding; Tax Fairness	"Tell Nethercutt we know the truth about his vote to cut our Medicare benefits. Another vote is coming. This time we'll be watching" *"Call Nethercutt – [800-number]"*	8/28/98-9/4/98	9/17/98	11/3/98	☑	☐
"Another"	WA-08	Randy Tate & Newt Gingrich	☐	Medicare Funding; Tax Fairness	"Tell Tate we know the truth about his vote to cut our Medicare benefits. Another vote is coming. This time we'll be watching" *"Call Tate – [800-number]"*	8/28/98-9/4/98	9/17/98	11/3/98	☑	☐
"Another"	CA-01	Frank Riggs & Newt Gingrich	☐	Medicare Funding; Tax Fairness	"Tell Frank Riggs we know the truth about his vote to cut our Medicare benefits. Another vote is coming. This time we'll be watching" *"Call Frank Riggs – [800-number]"*	8/28/98-9/4/98	3/26/98	11/3/98	☐	☐
"Another"	KY-01	Edward Whitfield & Newt Gingrich	☐	Medicare Funding; Tax Fairness	"Tell Whitfield we know the truth about his vote to cut our Medicare benefits. Another vote is coming. This time we'll be watching" *"Call Frank – [800-number]"*	8/28/98-9/4/98	5/26/98	11/3/98	☐	☐
"Another"	NE-02	Jon Christensen & Newt Gingrich	☐	Medicare Funding; Tax Fairness	"Tell Christensen we know the truth about his vote to cut our Medicare benefits. Another vote is coming. This time we'll be watching" *"Call Christensen – [800-number]"*	8/28/98-9/4/98	9/14/98	11/3/98	☐	☐
"Another"	MI-08	Dick Chrysler & Newt Gingrich	☐	Medicare Funding; Tax Fairness	"Tell Chrysler we know the truth about his vote to cut our Medicare benefits. Another vote is coming. This time we'll be watching" *"Call Chrysler – [800-number]"*	8/28/98-9/4/98	8/4/98	11/3/98	☐	☐
"Another"	ME-01	James Longley & Newt Gingrich	☐	Medicare Funding; Tax Fairness	"Tell Longley we know the truth about his vote to cut our Medicare benefits. Another vote is coming. This time we'll be watching" *"Call Longley – [800-number]"*	8/28/98-9/4/98	9/11/98	11/3/98	☐	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"Deny"	NC-04	Fred Heineman & Newt Gingrich	☑	Medicare Funding	"Other votes are coming. Call Fred Heineman at [800-number] and tell him that you know the truth about his vote to cut our medicare benefits. Tell Fred Heineman next time we'll be watching"	8/28/96-9/4/96	9/7/96	11/5/96	☐	☐
"Deny"	NC-02	David Funderburk & Newt Gingrich	☑	Medicare Funding	"Other votes are coming. Call David Funderburk at [800-number] and tell him that you know the truth about his vote to cut our medicare benefits. Tell David Funderburk next time we'll be watching"	8/28/96-9/4/96	9/7/96	11/5/96	☐	☐
"Deny"	PA-13	John Fox & Newt Gingrich	☑	Medicare Funding	"Other votes are coming. Call John Fox at [800-number] and tell him that you know the truth about his vote to cut our medicare benefits. Tell John Fox next time we'll be watching"	8/28/96-9/4/96	4/23/96	11/5/96	☐	☐
"No Two Way"	GA-10	Charlie Norwood & Newt Gingrich	☑	Education Funding; Tax Fairness	"Congress will vote again on the budget. Tell Norwood: don't write off our children's future. Tell him his priorities are all wrong." *"Call Hoke – [800-number]"*	9/5/96-9/15/96; 9/16/96-9/19/96	7/9/96	11/5/96	☐	☑
"No Two Way"	OH-10	Martin Hoke & Newt Gingrich	☐	Education Funding; Tax Fairness	"Congress will vote again on the budget. Tell Hoke: don't write off our children's future. Tell him his priorities are all wrong." *"Call Hoke – [800-number]"*	9/5/96-9/15/96; 9/16/96-9/19/96	3/19/96	11/5/96	☐	☑
"No Two Way"	MN-01	Gil Gutknecht & Newt Gingrich	☐	Education Funding; Tax Fairness	"Congress will vote again on the budget. Tell Gutknecht: don't write our children's future. Tell him his priorities are all wrong." *"Call Gutknecht – [800-number]"*	9/5/96-9/15/96	9/10/96	11/5/96	☑	☑
"No Two Way"	WA-08	George Nethercutt & Newt Gingrich	☐	Education Funding; Tax Fairness	"Congress will vote again on the budget. Tell Nethercutt: don't write our children's future. Tell him his priorities are all wrong." *"Call Nethercutt – [800-number]"*	9/5/96-9/15/96	9/17/96	11/5/96	☑	☑
"No Two Way"	WA-04	Doc Hastings & Newt Gingrich	☐	Education Funding; Tax Fairness	"Congress will vote again on the budget. Tell Hastings: don't write off our children's future. Tell him his priorities are all wrong." *"Call Hastings – [800-number]"*	9/5/96-9/15/96	9/17/96	11/5/96	☑	☑
"No Two Way"	WA-01	Rick White & Newt Gingrich	☐	Education Funding; Tax Fairness	"Congress will vote again on the budget. Tell White: don't write off our children's future. Tell him his priorities are all wrong." *"Call White – [800-number]"*	9/5/96-9/15/96	9/17/96	11/5/96	☑	☑
"No Two Way"	OK-02	Tom Coburn & Newt Gingrich	☐	Education Funding; Tax Fairness	"Congress will vote again on the budget. Tell Coburn: don't write off our children's future. Tell him his priorities are all wrong." *"Call Coburn – [800-number]"*	9/5/96-9/15/96; 9/16/96-9/19/96	8/27/96	11/5/96	☐	☑

514

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"Deny"	OR-05	Jim Bunn & Newt Gingrich	☐	Medicare Funding; Tax Fairness	"Tell Bunn we know the truth about his vote to cut our Medicare benefits. Another vote is coming. This time we'll be watching" *"Call Bunn – [800-number]"*	8/28/96-9/4/96	5/21/96	11/5/96	☐	☐
"Another"	PA-21	Phil English & Newt Gingrich	☐	Medicare Funding; Tax Fairness	"Tell English we know the truth about his vote to cut our Medicare benefits. Another vote is coming. This time we'll be watching" *"Call English – [800-number]"*	8/28/96-9/4/96	4/23/96	11/5/96	☐	☐
"Another"	NC-02	David Funderburk & Newt Gingrich	☐	Medicare Funding; Tax Fairness	"Tell Funderburk we know the truth about his vote to cut our Medicare benefits. Another vote is coming. This time we'll be watching" *"Call Funderburk – [800-number]"*	8/28/96-9/4/96	5/7/96	11/5/96	☐	☐
"Another"	KS-04	Todd Tiahrt & Newt Gingrich	☐	Medicare Funding; Tax Fairness	"Tell Tiahrt we know the truth about his vote to cut our Medicare benefits. Another vote is coming. This time we'll be watching" *"Call Tiahrt – [800-number]"*	8/27/96-9/4/96	8/6/96	11/5/96	☐	☐
"Another"	NC-04	Fred Heineman & Newt Gingrich	☐	Medicare Funding; Tax Fairness	"Tell Heineman we know the truth about his vote to cut our Medicare benefits. Another vote is coming. This time we'll be watching" *"Call Heineman – [800-number]"*	8/28/96-9/4/96	5/7/96	11/5/96	☐	☐
"Deny"	KY-01	Edward Whitfield & Newt Gingrich	☑	Medicare Funding	"Other votes are coming. Call Edward Whitfield at [800-number] and tell him that you know the truth about his vote to cut our medicare benefits. Tell Edward Whitfield next time we'll be watching"	8/28/96-9/4/96	5/28/96	11/5/96	☐	☐
"Deny"	TX-08	Steve Stockman & Newt Gingrich	☑	Medicare Funding	"Other votes are coming. Call Steve Stockman at [800-number] and tell him that you know the truth about his vote to cut our medicare benefits. Tell Steve Stockman next time we'll be watching".	8/28/96-9/4/96	3/12/96	11/5/96	☐	☐
"Deny"	CA-01	Frank Riggs & Newt Gingrich	☑	Medicare Funding	"Other votes are coming. Call Frank Riggs at [800-number] and tell him that you know the truth about his vote to cut our medicare benefits. Tell Frank Riggs next time we'll be watching"	8/28/96-9/4/96	3/26/96	11/5/96	☐	☐
"Deny"	IN-08	John Hostettler & Newt Gingrich	☑	Medicare Funding	"Other votes are coming. Call John Hostettler at [800-number] and tell him that you know the truth about his vote to cut our medicare benefits. Tell John Hostettler next time we'll be watching"	8/28/96-9/4/96	5/7/96	11/5/96	☐	☐

513

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"No Two Way"	ID-01	Helen Chenoweth & Newt Gingrich	☐	Education Funding; Tax Fairness	"Congress will vote again on the budget. Tell Chenoweth: don't write off our children's future. Tell him his priorities are all wrong." *"Call Chenoweth – [800-number]"*	9/5/98-9/15/98; 9/16/98-9/19/98	5/26/98	11/3/98	☐	☑
"No Two Way"	AZ-08	J.D. Hayworth & Newt Gingrich	☐	Education Funding; Tax Fairness	"Congress will vote again on the budget. Tell Hayworth: don't write of our children's future. Tell him his priorities are all wrong." *"Call J.D. Hayworth – [800-number]"*	9/5/98-9/15/98; 9/16/98-9/19/98	9/1/98	11/3/98	☑	☑
"No Two Way"	NV-01	John Ensign & Newt Gingrich	☐	Education Funding; Tax Fairness	"Congress will vote again on the budget. Tell Ensign: don't write off our children's future. Tell him his priorities are all wrong." *"Call Ensign – [800-number]"*	9/5/98-9/15/98; 9/16/98-9/19/98	9/2/98	11/3/98	☐	☑
"No Two Way" (Alt. Script)	PA-21	Phil English & Newt Gingrich	☐	Education Funding; Tax Fairness	"Congress will vote again on the budget. Tell English: don't write off our children's future. Tell him his priorities are all wrong." *"Call English – [800-number]"*	9/5/98-9/15/98; 9/16/98-9/19/98	4/23/98	11/3/98	☐	☑
"No Two Way"	CA-01	Frank Riggs & Newt Gingrich	☐	Education Funding; Tax Fairness	"Congress will vote again on the budget. Tell Riggs: don't write off ou children's future. Tell him his priorities are all wrong." *"Call Riggs – [800-number]"*	9/5/98-9/15/98; 9/16/98-9/19/98	3/26/98	11/3/98	☐	☑
"No Two Way"	TX-08	Steve Stockman & Newt Gingrich	☐		"Congress will vote again on the budget. Tell Stockman: don't write o our children's future. Tell him his priorities are all wrong." *"Call Stockman – [800-number]"*	9/5/98-9/15/98	3/12/98	11/3/98	☐	☑
"No Two Way"	NH-02	Charles Bass & Newt Gingrich	☐	Education Funding; Tax Fairness	"Congress will vote again on the budget. Tell Bass: don't write off ou children's future. Tell him his priorities are all wrong." *"Call Bass – [800-number]"*	9/5/98-9/15/98; 9/16/98-9/19/98	9/1/98	11/3/98	☑	☑
"No Two Way"	GA-10	Charlie Norwood & Newt Gingrich	☐		"Congress will vote again on the budget. Tell Norwood: don't write of our children's future. Tell him his priorities are all wrong." *"Call Norwood – [800-number]"*	9/5/98-9/15/98	7/28/98	11/3/98	☐	☑
"No Two Way"	CT-05	Gary Franks & Newt Gingrich	☐	Education Funding; Tax Fairness	"Congress will vote again on the budget. Tell Franks: don't write off our children's future. Tell him his priorities are all wrong." *"Call Gary Franks – [800-number]"*	9/5/98-9/15/98	9/10/98	11/3/98	☑	☑
"No Two Way" (Alt. Script)	OR-05	Jim Bunn & Newt Gingrich	☐	Education Funding; Tax Fairness	"Congress will vote again on the budget. Tell Bunn: don't write off ou children's future. Tell him his priorities are all wrong." *"Call Bunn – [800-number]"*	9/5/98-9/15/98; 9/16/98-9/19/98	5/21/98	11/3/98	☐	☑

516

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"No Two Way"	OH-08	Frank Cremeans & Newt Gingrich	☐	Education Funding; Tax Fairness	"Congress will vote again on the budget. Tell Cremeans: don't write our children's future. Tell him his priorities are all wrong." *"Call Cremeans – [800-number]"*	9/5/98-9/15/98; 9/16/98-9/19/98	3/10/98	11/3/98	☐	☑
"No Two Way"	NC-02	David Funderburk & Newt Gingrich	☐	Education Funding; Tax Fairness	"Congress will vote again on the budget. Tell Funderburk: don't write off our children's future. Tell him his priorities are all wrong." *"Call Funderburk – [800-number]"*	9/5/98-9/15/98	5/7/98	11/3/98	☐	☑
"No Two Way"	WA-08	Randy Tate & Newt Gingrich	☐	Education Funding; Tax Fairness	"Congress will vote again on the budget. Tell Tate: don't write off our children's future. Tell him his priorities are all wrong." *"Call Tate – [800-number]"*	9/5/98-9/15/98	9/17/98	11/3/98	☑	☑
"No Two Way"	NE-02	Jon Christensen & Newt Gingrich	☐	Education Funding; Tax Fairness	"Congress will vote again on the budget. Tell Christensen: don't write off our children's future. Tell him his priorities are all wrong." *"Call Christensen – [800-number]"*	9/5/98-9/15/98; 9/16/98-9/19/98	5/14/98	11/3/98	☐	☑
"No Two Way"	OH-01	Steve Chabot & Newt Gingric	☐	Education Funding; Tax Fairness	"Congress will vote again on the budget. Tell Chabot: don't write off our children's future. Tell him his priorities are all wrong." *"Call Chabot – [800-number]"*	9/5/98-9/15/98; 9/16/98-9/19/98	3/10/98	11/3/98	☐	☑
"No Two Way"	MI-08	Dick Chrysler & Newt Gingrich	☐	Education Funding; Tax Fairness	"Congress will vote again on the budget. Tell Chrysler: don't write off our children's future. Tell him his priorities are all wrong." *"Call Chrysler – [800-number]"*	9/5/98-9/15/98; 9/16/98-9/19/98	8/5/98	11/3/98	☐	☑
"No Two Way"	KY-01	Edward Whitfield & Newt Gingrich	☐	Education Funding; Tax Fairness	"Congress will vote again on the budget. Tell Whitfield: don't write off our children's future. Tell him his priorities are all wrong." *"Call Whitfield – [800-number]"*	9/5/98-9/15/98; 9/16/98-9/19/98	5/26/98	11/3/98	☐	☑
"No Two Way"	KS-04	Todd Tiahrt & Newt Gingrich	☐	Education Funding; Tax Fairness	"Congress will vote again on the budget. Tell Tiahrt: don't write off ou children's future. Tell him his priorities are all wrong." *"Call Tiahrt – [800-number]"*	9/5/98-9/15/98; 9/16/98-9/19/98	8/5/98	11/3/98	☐	☑
"No Two Way"	IA-04	Greg Ganske & Newt Gingrich	☐	Education Funding; Tax Fairness	"Congress will vote again on the budget. Tell Ganske: don't write off our children's future. Tell him his priorities are all wrong." *"Call Ganske – [800-number]"*	9/5/98-9/15/98; 9/16/98-9/19/98	6/4/98	11/3/98	☐	☑
"No Two Way"	IN-08	John Hostettler & Newt Gingrich	☐	Education Funding; Tax Fairness	"Congress will vote again on the budget. Tell Hostettler: don't write o our children's future. Tell him his priorities are all wrong." *"Call Hostettler – [800-number]"*	9/5/98-9/15/98; 9/16/98-9/19/98	5/7/98	11/3/98	☐	☑

515

518

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type Pictured in italic type	Radio?	Issue(s) Discussed	Call to Action Audio in normal type Video in italic type	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"No Two Way"	IN-08	John Hostettler & Newt Gingrich	☑		"Congress will vote again on the budget. Tell Hostettler: don't vote o our children's future. Tell him his priorities are all wrong."	9/6/98-9/15/98; 9/16/98-9/18/98	5/7/98	11/5/98	☐	☑
"No Two Way"	KY-01	Edward Whitfield & Newt Gingrich	☑		"Congress will vote again on the budget. Tell Whitfield: don't vote all our children's future. Tell him his priorities are all wrong."	9/5/98-9/13/98; 9/16/98-9/18/98	5/26/98	11/5/98	☐	☑
"No Two Way"	MN-01	Gil Gutknecht & Newt Gingric	☑		"Congress will vote again on the budget. Tell Gutknecht: don't vote our children's future. Tell him his priorities are all wrong."	9/5/98-9/15/98	9/10/98	11/5/98	☑	☑
"No Two Way"	GA-10	Charlie Norwood & Newt Gingrich	☑		"Congress will vote again on the budget. Tell Norwood: don't vote of our children's future. Tell him his priorities are all wrong."	9/5/98-9/15/98; 9/16/98-9/18/98	7/8/98	11/5/98	☐	☑
"No Two Way"	TX-08	Steve Stockman & Newt Gingrich	☑		"Congress will vote again on the budget. Tell Stockman: don't vote o our children's future. Tell him his priorities are all wrong."	9/5/98-9/15/98; 9/16/98-9/28/98	3/12/98	11/5/98	☐	☑
"Radio"	NC-02	David Funderburk & Bob Etheridge	☐	Pension Security	"When it comes to your pension, there is a difference. Call and find out." "Voter Information for Working Families 1-888-236-3467"	9/28/98-10/5/98	5/7/98	11/5/98	☐	☑
"Radio"	TX-09	Steve Stockman & Nick Lampson	☐	Pension Security	"When it comes to your pension, there is a difference. Call and find out." "Voter Information for Working Families 1-888-236-3467"	9/28/98-10/5/98	3/12/98	11/5/98	☐	☑
"Radio"	PA-21	Phil English & Ron Clinkscale	☐	Pension Security	"When it comes to your pension, there is a difference. Call and find out." "Voter Information for Working Families 1-888-236-3467"	9/28/98-10/5/98	4/28/98	11/5/98	☐	☑
"Radio"	OR-05	Jim Bunn & Darlene Hooley	☐	Pension Security	"When it comes to your pension, there is a difference. Call and find out." "Voter Information for Working Families 1-888-236-3467"	9/28/98-10/5/98	5/21/98	11/5/98	☐	☑
"Radio"	OK-02	Tom Coburn & Glen Johnson	☐	Pension Security	"When it comes to your pension, there is a difference. Call and find out." "Voter Information for Working Families 1-888-236-3467"	9/28/98-10/5/98	8/27/98	11/5/98	☐	☑

517

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type Pictured in italic type	Radio?	Issue(s) Discussed	Call to Action Audio in normal type Video in italic type	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"No Two Way" (Alt. Script)	NC-04	Fred Heineman & Newt Gingrich	☐	Education Funding; Tax Fairness	"Congress will vote again on the budget. Tell Heineman: don't vote our children's future. Tell him his priorities are all wrong." "Call Heineman – [800-number]"	9/5/98-9/15/98	5/7/98	11/5/98	☐	☑
"No Two Way" (Alt. Script)	NY-25	Jim Walsh & Newt Gingrich	☐	Education Funding; Tax Fairness	"Congress will vote again on the budget. Tell Walsh: don't vote all o children's future. Tell him his priorities are all wrong." "Call Walsh – [800-number]"	9/5/98-9/13/98; 9/16/98-9/18/98	9/10/98	11/5/98	☑	☑
"No Two Way" (Alt. Script)	NJ-08	Bill Martini & Newt Gingrich	☐	Education Funding; Tax Fairness	"Congress will vote again on the budget. Tell Martini: don't vote all o children's future. Tell him his priorities are all wrong." "Call Martini – [800-number]"	9/5/98-9/15/98; 9/16/98-9/18/98	6/4/98	11/5/98	☐	☑
"No Two Way" (Alt. Script)	ME-01	James Longley & Newt Gingrich	☐	Education Funding; Tax Fairness	"Congress will vote again on the budget. Tell Longley: don't vote all our children's future. Tell him his priorities are all wrong." "Call Longley – [800-number]"	9/5/98-9/15/98; 9/16/98-9/18/98	6/11/98	11/5/98	☐	☑
"No Two Way"	CA-22	Andrea Seastrand & Newt Gingrich	☐	Education Funding; Tax Fairness	"Congress will vote again on the budget. Tell Seastrand: don't vote our children's future;" Tell her her priorities are all wrong" "Call Seastrand – [800-number]"	9/5/98-9/15/98; 9/16/98-9/18/98	3/26/98	11/5/98	☐	☑
"No Two Way"	TX-08	Steve Stockman & Newt Gingrich	☑	Education Funding; Tax Fairness	"Congress will vote again on the budget. Tell Stockman: don't vote o our children's future. Tell him his priorities are all wrong."	9/5/98-9/15/98; 9/16/98-9/28/98	3/12/98	11/5/98	☐	☑
"No Two Way" (Alt. Script)	NC-04	Fred Heineman & Newt Gingrich	☑		"Congress will vote again on the budget. Tell Heineman: don't vote our children's future. Tell him his priorities are all wrong."	9/5/98-9/15/98	5/7/98	11/5/98	☐	☑
"No Two Way"	CA-01	Frank Riggs & Newt Gingrich	☑		"Congress will vote again on the budget. Tell Riggs: don't vote all ou children's future. Tell him his priorities are all wrong."	9/5/98-9/15/98; 9/16/98-9/18/98	3/26/98	11/5/98	☐	☑
"No Two Way"	NC-02	David Funderburk & Newt Gingrich	☑		"Congress will vote again on the budget. Tell Funderburk: don't vote all our children's future. Tell him his priorities are all wrong."	9/5/98-9/15/98	5/7/98	11/5/98	☐	☑
"No Two Way"	MA-06	Peter Torkildsen & Newt Gingrich	☑	Education Funding; Tax Fairness	"Congress will vote again on the budget. Tell Torkildsen: don't vote our children's future. Tell him his priorities are all wrong."	9/5/98-9/15/98; 9/16/98-9/18/98	9/17/98	11/5/98	☑	☑

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Retire"	GA-06	Sax Chamblee & Jim Wiggins	☐	Pension Security	"When it comes to your pension, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3457"*	9/28/98-10/5/98	7/6/98	11/3/98	☐	☑
"Retire"	GA-10	Charlie Norwood & David Ball	☐	Pension Security	"When it comes to your pension, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3457"*	9/28/98-10/5/98	7/6/98	11/3/98	☐	☑
"Retire"	IA-04	Greg Ganske & Connie McBurney	☐	Pension Security	"When it comes to your pension, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3457"*	9/28/98-10/5/98	6/4/98	11/3/98	☐	☑
"Retire"	ID-01	Helen Chenoweth & Dan Williams	☐	Pension Security	"When it comes to your pension, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3457"*	9/28/98-10/5/98	5/26/98	11/3/98	☐	☑
"Retire"	IN-08	John Hostettler & Jonathan Weinzapfel	☐	Pension Security	"When it comes to your pension, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3457"*	9/28/98-10/5/98	5/7/98	11/3/98	☐	☑
"Retire"	NJ-05	Bill Martini & Bill Pascrell	☐	Pension Security	"When it comes to your pension, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3457"*	9/28/98-10/5/98	6/4/98	11/3/98	☐	☑
"Vote"	NH-02	Charles Bass & Annie Arness	☐	Education Funding	"When it comes to education, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3457"*	9/28/98-10/5/98	9/10/98	11/3/98	☐	☑
"Retire"	AZ-05	J. D. Hayworth & Steve Owen	☐	Pension Security	"When it comes to your pension, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3457"*	9/28/98-10/5/98	9/10/98	11/3/98	☐	☑
"Vote"	AZ-05	Steve Owens & J. D. Hayworth	☐	Education Funding	"When it comes to education, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3457"*	9/28/98-10/5/98	9/10/98	11/3/98	☐	☑
"Vote"	ID-01	Helen Chenoweth & Dan Williams	☐	Education Funding	"When it comes to education, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3457"*	9/28/98-10/5/98	5/26/98	11/3/98	☐	☑
"Retire"	KY-01	Edward Whitfield & Dennis Null	☐	Pension Security	"When it comes to your pension, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3457"*	9/28/98-10/5/98	5/26/98	11/3/98	☐	☑

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Retire"	OH-10	Martin Hoke & Dennis Kucinich	☐	Pension Security	"When it comes to your pension, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3457"*	9/28/98-10/5/98	3/10/98	11/3/98	☐	☑
"Retire"	OH-01	Steve Chabot & Mark Longabaugh	☐	Pension Security	"When it comes to your pension, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3457"*	9/28/98-10/5/98	3/10/98	11/3/98	☐	☑
"Retire"	NY-25	Jim Walsh & Marty Mack	☐	Pension Security	"When it comes to your pension, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3457"*	9/28/98-10/5/98	9/10/98	11/3/98	☐	☑
"Retire"	NV-01	John Ensign & Bob Coffin	☐	Pension Security	"When it comes to your pension, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3457"*	9/28/98-10/5/98	9/3/98	11/3/98	☐	☑
"Vote"	CA-10	Charlie Norwood & David Ball	☐	Education Funding	"When it comes to education, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3457"*	9/28/98-10/5/98	7/6/98	11/3/98	☐	☑
"Retire"	NH-02	Charles Bass & Annie Arness	☐	Pension Security	"When it comes to your pension, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3457"*	9/28/98-10/5/98	9/10/98	11/3/98	☐	☑
"Retire"	WA-09	Randy Tate & Adam Smith	☐	Pension Security	"When it comes to your pension, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3457"*	9/28/98-10/5/98	9/17/98	11/3/98	☐	☑
"Retire"	ME-01	James Longley & Tom Allen	☐	Pension Security	"When it comes to your pension, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3457"*	9/28/98-10/5/98	6/11/98	11/3/98	☐	☑
"Vote"	WA-09	Randy Tate & Adam Smith	☐	Education Funding	"When it comes to education, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3457"*	9/28/98-10/5/98	9/17/98	11/3/98	☐	☑
"Retire"	CA-01	Frank Riggs & Michela Alioto	☐	Pension Security	"When it comes to your pension, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3457"*	9/28/98-10/5/98	3/26/98	11/3/98	☐	☑
"Retire"	CA-22	Andrea Seastrand & Walter Capps	☐	Pension Security	"When it comes to your pension, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3457"*	9/28/98-10/5/98	3/26/98	11/3/98	☐	☑

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate: Named in normal type; Pictured in italic type	Radio?	Issue(s) Discussed	Call to Action: Audio in normal type; Video in italic type	Dates: Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Kids"	CA-01	Frank Riggs & Michela Alioto	☐	Education Funding	"When it comes to education, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	9/29/98-10/5/98	3/26/98	11/5/98	☐	☑
"Kids"	IA-04	Greg Ganske & Connie McBurney	☐	Education Funding	"When it comes to education, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	9/29/98-10/5/98	6/4/98	11/5/98	☐	☑
"Kids"	KY-01	Edward Whitfield & Dennis Hall	☐	Education Funding	"When it comes to education, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	9/29/98-10/5/98	5/26/98	11/5/98	☐	☑
"Retire"	NH-02	Charles Bass & Annie Amaso	☐	Pension Security	"When it comes to your pension, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	9/25/98-10/5/98	9/10/98	11/5/98	☐	☑
"Medicare"	KY-01	Edward Whitfield & Dennis Hall	☑		"When it comes to Medicare there is a difference. Call and find out."	9/25/98-10/5/98; 10/10/98-10/15/98	5/26/98	11/5/98	☐	☑
"Students"	MT-AL	Rick Hill & Bill Yellowtail	☐	Education Funding	"When it comes to education, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	10/1/98-10/14/98; 10/15/98-10/20/98	6/4/98	11/5/98	☐	☑
"Students"	TX-14	Lofty Morris & Ron Paul	☐	Education Funding	"When it comes to education, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	10/1/98-10/14/98; 10/15/98-10/20/98	3/12/98	11/5/98	☐	☑
"Students"	IL-20	Jay Hoffman & John Shimkus	☐	Education Funding	"When it comes to education, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	10/1/98-10/14/98; 10/15/98-10/20/98	3/19/98	11/5/98	☐	☑
"Kids"	GA-08	Sax Chambliss & Jim Wiggins	☑		"When it comes to education, there is a difference. Call and find out."	9/28/98-10/5/98	7/8/98	11/5/98	☐	☑
"Medicare"	MA-08	Peter Torkildson & John Tierney	☑	Medicare Funding	"When it comes to Medicare there is a difference. Call and find out."	9/28/98-10/5/98; 10/10/98-10/15/98	9/17/98	11/5/98	☐	☑
"Kids"	OR-05	Jim Bunn & Darlene Hooley	☐	Education Funding	"When it comes to education, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	9/29/98-10/5/98	5/21/98	11/5/98	☐	☑

522

Counsel Only

Title	District	Officeholder/Candidate: Named in normal type; Pictured in italic type	Radio?	Issue(s) Discussed	Call to Action: Audio in normal type; Video in italic type	Dates: Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Kids"	IN-08	John Hostettler & Jonathan Weinzapfel	☐	Education Funding	"When it comes to education, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	9/29/98-10/5/98	5/7/98	11/5/98	☐	☑
"Kids"	NC-02	David Funderburk & Bob Etheridge	☐	Education Funding	"When it comes to education, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	9/29/98-10/5/98	5/7/98	11/5/98	☐	☑
"Retire"	WA-01	Rick White & Jeff Coopersmith	☐	Pension Security	"When it comes to your pension, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	9/25/98-10/5/98	9/17/98	11/5/98	☐	☑
"Kids"	NV-01	John Ensign & Bob Coffin	☐	Education Funding	"When it comes to education, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	9/29/98-10/5/98	9/3/98	11/5/98	☐	☑
"Kids"	OH-01	[illegible] Chabot & Mark Longabaugh	☐	Education Funding	"When it comes to education, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	9/29/98-10/5/98	3/19/98	11/5/98	☐	☑
"Kids"	OH-10	Martin Hoke & Dennis Kucinich	☐	Education Funding	"When it comes to education, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	9/29/98-10/5/98	3/19/98	11/5/98	☐	☑
"Kids"	OK-02	Tom Coburn & Glen Johnson	☐	Education Funding	"When it comes to education, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	9/29/98-10/5/98	8/27/98	11/5/98	☐	☑
"Kids"	TX-09	Steve Stockman & Nick Lampson	☐	Education Funding	"When it comes to education, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	9/29/98-10/5/98	3/12/98	11/5/98	☐	☑
"Kids"	WA-01	Rick White & Jeff Coopersmith	☐	Education Funding	"When it comes to education, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	9/29/98-10/5/98	9/17/98	11/5/98	☐	☑
"Kids"	GA-08	Sax Chambliss & Jim Wiggins	☐	Education Funding	"When it comes to education, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	9/29/98-10/5/98	7/8/98	11/5/98	☐	☑
"Kids"	CA-22	Andrea Seastrand & Walter Capps	☐	Education Funding	"When it comes to education, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	9/29/98-10/5/98	3/26/98	11/5/98	☐	☑

521

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate: Named in normal type / Pictured in italic type	Radio?	Issue(s) Discussed	Call to Action: Audio in normal type / Video in italic type	Dates: Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"Vote"	NJ-05	Bill Martini & Bill Parcell	☐	Education Funding	"When it comes to education, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-335-3463"*	9/28/98-10/6/98	6/4/98	11/3/98	☐	☑
"Vote"	ME-01	James Longley & Tom Allen	☐	Education Funding	"When it comes to education, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-335-3463"*	9/28/98-10/6/98	6/11/98	11/3/98	☐	☑
"Vote"	IN-08	John Hostettler & Jonathan Weinzapfel	☑		"When it comes to education, there is a difference. Call and find out."	9/28/98-10/6/98	5/7/98	11/3/98	☐	☑
"Retire"	GA-08	Saxi Chambliss & Jim Wiggins	☑		"When it comes to your pension, there is a difference. Call and find out."	9/28/98-10/6/98	7/9/98	11/3/98	☐	☑
"Retire"	GA-10	Charlie Norwood & David Bell	☑		"When it comes to your pension, there is a difference. Call and find out."	9/28/98-10/6/98	7/9/98	11/3/98	☐	☑
"Retire"	CA-01	Frank Riggs & Michela Alioto	☑		"When it comes to your pension, there is a difference. Call and find out."	9/28/98-10/6/98	3/26/98	11/3/98	☐	☑
"Retire"	IN-08	John Hostettler & Jonathan Weinzapfel	☑		"When it comes to your pension, there is a difference. Call and find out."	9/28/98-10/6/98	5/7/98	11/3/98	☐	☑
"Medicare"	GA-10	Charlie Norwood & David Bell	☑		"When it comes to Medicare there is a difference. Call and find out."	9/28/98-10/6/98; 10/10/98-10/15/98	7/9/98	11/3/98	☐	☑
"Medicare"	IN-08	John Hostettler & Jonathan Weinzapfel	☑		"When it comes to Medicare there is a difference. Call and find out."	9/28/98-10/6/98; 10/10/98-10/15/98	5/7/98	11/3/98	☐	☑
"Medicare"	GA-08	Saxi Chambliss & Jim Wiggins	☑		"When it comes to Medicare there is a difference. Call and find out."	9/28/98-10/6/98; 10/10/98-10/15/98	7/9/98	11/3/98	☐	☑
"Medicare"	CA-01	Frank Riggs & Michela Alioto	☑		"When it comes to Medicare there is a difference. Call and find out."	9/28/98-10/6/98; 10/10/98-10/15/98	3/26/98	11/3/98	☐	☑

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate: Named in normal type / Pictured in italic type	Radio?	Issue(s) Discussed	Call to Action: Audio in normal type / Video in italic type	Dates: Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"Vote"	NC-02	David Funderburk & Bob Etheridge	☑		"When it comes to education, there is a difference. Call and find out."	9/28/98-10/6/98	5/7/98	11/3/98	☐	☑
"Vote"	KY-01	Edward Whitfield & Dennis Null	☑		"When it comes to education, there is a difference. Call and find out."	9/28/98-10/6/98	5/26/98	11/3/98	☐	☑
"Vote"	GA-10	Charlie Norwood & David Bell	☑		"When it comes to education, there is a difference. Call and find out."	9/28/98-10/6/98	7/9/98	11/3/98	☐	☑
"Vote"	CA-01	Frank Riggs & Michela Alioto	☑		"When it comes to education, there is a difference. Call and find out."	9/28/98-10/6/98	3/26/98	11/3/98	☐	☑
"Retire"	KY-01	Edward Whitfield & Dennis Null	☑		"When it comes to your pension, there is a difference. Call and find out."	9/28/98-10/6/98	5/26/98	11/3/98	☐	☑
"Retire"	TX-09	Steve Stockman & Nick Lampson	☑		"When it comes to your pension, there is a difference. Call and find out."	9/28/98-10/6/98	3/12/98	11/3/98	☐	☑
"Retire"	NC-02	David Funderburk & Bob Etheridge	☑		"When it comes to your pension, there is a difference. Call and find out."	9/28/98-10/6/98	5/7/98	11/3/98	☐	☑
"Retire"	MA-08	Peter Torkildsen & John Tierney	☑	Pension Security	"When it comes to your pension, there is a difference. Call and find out."	9/28/98-10/6/98	9/17/98	11/3/98	☐	☑
"Vote"	NY-25	Jim Walsh & Marty Mack	☐	Education Funding	"When it comes to education, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-335-3463"*	9/28/98-10/6/98	9/10/98	11/3/98	☐	☑
"Vote"	PA-21	Phil English & Ron DiNicola	☐	Education Funding	"When it comes to education, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-335-3463"*	9/28/98-10/6/98	4/28/98	11/3/98	☐	☑
"Vote"	MA-08	Peter Torkildsen & John Tierney	☑	Education Funding	"When it comes to education, there is a difference. Call and find out."	9/28/98-10/6/98	9/17/98	11/3/98	☐	☑

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Medicare"	GA-08	Sen Chambliss & Jim Wiggins	☐	Medicare Funding	"When it comes to Medicare there is a difference. Call and find out." "Voter Information for Working Families 1-888-238-3457"	9/28/00-10/5/00; 10/10/00-10/15/00	7/8/00	11/5/00	☐	☑
"Medicare"	HI-02	Charles Djou & Ernie Amano	☐	Medicare Funding	"When it comes to Medicare there is a difference. Call and find out." "Voter Information for Working Families 1-888-238-3457"	9/28/00-10/5/00; 10/10/00-10/15/00	9/10/00	11/5/00	☐	☑
"Medicare"	OR-05	Jim Bunn & Darlene Hooley	☐	Medicare Funding	"When it comes to Medicare there is a difference. Call and find out." "Voter Information for Working Families 1-888-238-3457"	9/28/00-10/5/00; 10/10/00-10/15/00	5/21/00	11/5/00	☐	☑
"Medicare"	CA-01	Frank Riggs & Michela Alioto	☐	Medicare Funding	"When it comes to Medicare there is a difference. Call and find out." "Voter Information for Working Families 1-888-238-3457"	9/28/00-10/5/00; 10/10/00-10/15/00	3/28/00	11/5/00	☐	☑
"Medicare"	CA-22	Andrea Seastrand & Walter Capps	☐	Medicare Funding	"When it comes to Medicare there is a difference. Call and find out." "Voter Information for Working Families 1-888-238-3457"	9/28/00-10/5/00; 10/10/00-10/15/00	3/28/00	11/5/00	☐	☑
"Medicare"	ID-01	Helen Chenoweth & Dan Williams	☐	Medicare Funding	"When it comes to Medicare there is a difference. Call and find out." "Voter Information for Working Families 1-888-238-3457"	9/28/00-10/5/00; 10/10/00-10/15/00	5/23/00	11/5/00	☐	☑
"Medicare"	WA-08	Randy Tate & Adam Smith	☐	Medicare Funding	"When it comes to Medicare there is a difference. Call and find out." "Voter Information for Working Families 1-888-238-3457"	9/28/00-10/5/00; 10/10/00-10/15/00	9/17/00	11/5/00	☐	☑
"Medicare"	NY-01	John Ensign & Bob Coffin	☐	Medicare Funding	"When it comes to Medicare there is a difference. Call and find out." "Voter Information for Working Families 1-888-238-3457"	9/28/00-10/5/00; 10/10/00-10/15/00	9/5/00	11/5/00	☐	☑
"Medicare"	NY-25	Jim Walsh & Marty Mack	☐	Medicare Funding	"When it comes to Medicare there is a difference. Call and find out." "Voter Information for Working Families 1-888-238-3457"	9/28/00-10/5/00; 10/10/00-10/15/00	9/19/00	11/5/00	☐	☑
"Medicare"	OH-01	Steve Chabot & Mark Longabaugh	☐	Medicare Funding	"When it comes to Medicare there is a difference. Call and find out." "Voter Information for Working Families 1-888-238-3457"	9/28/00-10/5/00; 10/10/00-10/15/00	3/19/00	11/5/00	☐	☑

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Medicare"	TX-09	Steve Stockman & Nick Lampson	☑		"When it comes to Medicare there is a difference. Call and find out."	9/28/00-10/5/00; 10/10/00-10/15/00	3/13/00	11/5/00	☐	☑
"Vote"	TX-09	Steve Stockman & Nick Lampson	☑		"When it comes to education, there is a difference. Call and find out."	9/28/00-10/5/00	3/13/00	11/5/00	☐	☑
"Medicare"	NC-02	David Funderburk & Bob Etheridge	☑		"When it comes to Medicare there is a difference. Call and find out."	9/28/00-10/5/00; 10/10/00-10/15/00	5/7/00	11/5/00	☐	☑
"Medicare"	GA-10	Charlie Norwood & David Ball	☐	Medicare Funding	"When it comes to Medicare there is a difference. Call and find out." "Voter Information for Working Families 1-888-238-3457"	9/28/00-10/5/00; 10/10/00-10/15/00	7/8/00	11/5/00	☐	☑
"Medicare"	NC-02	David Funderburk & Bob Etheridge	☐	Medicare Funding	"When it comes to Medicare there is a difference. Call and find out." "Voter Information for Working Families 1-888-238-3457"	9/28/00-10/5/00; 10/10/00-10/15/00	5/7/00	11/5/00	☐	☑
"Medicare"	ME-01	James Longley & Tom Allen	☐	Medicare Funding	"When it comes to Medicare there is a difference. Call and find out." "Voter Information for Working Families 1-888-238-3457"	9/28/00-10/5/00; 10/10/00-10/15/00	6/11/00	11/5/00	☐	☑
"Medicare"	AZ-05	J. D. Hayworth & Steve Owen	☐	Medicare Funding	"When it comes to Medicare there is a difference. Call and find out." "Voter Information for Working Families 1-888-238-3457"	9/28/00-10/5/00; 10/10/00-10/15/00	9/10/00	11/5/00	☐	☑
"Medicare"	KY-01	Edward Whitfield & Dorcas Hall	☐	Medicare Funding	"When it comes to Medicare there is a difference. Call and find out." "Voter Information for Working Families 1-888-238-3457"	9/28/00-10/5/00; 10/10/00-10/15/00	5/23/00	11/5/00	☐	☑
"Medicare"	IN-08	John Hostettler & Jonathon Weinzapfel	☐	Medicare Funding	"When it comes to Medicare there is a difference. Call and find out." "Voter Information for Working Families 1-888-238-3457"	9/28/00-10/5/00; 10/10/00-10/15/00	5/7/00	11/5/00	☐	☑
"Medicare"	IA-04	Greg Ganske & Connie McBurney	☐	Medicare Funding	"When it comes to Medicare there is a difference. Call and find out." "Voter Information for Working Families 1-888-238-3457"	9/28/00-10/5/00; 10/10/00-10/15/00	6/4/00	11/5/00	☐	☑

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type Pictured in italic type	Radio?	Issue(s) Discussed	Call to Action Audio in normal type Video in italic type	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"Taxes"	OR-05	Jim Bunn & Darlene Hooley	☑	Tax Fairness	"When it comes to taxes, there is a difference. Call and find out."	10/10/98-10/25/98; 10/26/98-11/5/98	5/21/98	11/5/98	☐	☑
"Taxes"	PA-21	Phil English & Ron Dilks	☐	Tax Fairness	"When it comes to taxes, there is a difference. Call and find out." "Voter Information for Working Families 1-888-235-3483"	10/10/98-10/15/98; 10/19/98-10/25/98; 10/26/98-11/5/98	4/23/98	11/5/98	☐	☑
"Taxes"	OK-02	Tom Coburn & Glen Johnson	☐	Tax Fairness	"When it comes to taxes, there is a difference. Call and find out." "Voter Information for Working Families 1-888-235-3483"	10/10/98-10/15/98	5/27/98	11/5/98	☐	☑
"Taxes"	AZ-06	J. D. Hayworth & Steve Owen	☐	Tax Fairness	"When it comes to taxes, there is a difference. Call and find out." "Voter Information for Working Families 1-888-235-3483"	10/10/98-10/15/98; 10/16/98-10/25/98; 10/26/98-11/5/98	9/15/98	11/5/98	☐	☑
"Taxes"	ID-01	Helen Chenoweth & Dan Williams	☐	Tax Fairness	"When it comes to taxes, there is a difference. Call and find out." "Voter Information for Working Families 1-888-235-3483"	10/10/98-10/15/98; 10/19/98-10/25/98; 10/26/98-11/5/98	5/26/98	11/5/98	☐	☑
"Taxes"	OH-10	Martin Hoke & Dennis Kucinich	☐	Tax Fairness	"When it comes to taxes, there is a difference. Call and find out." "Voter Information for Working Families 1-888-235-3483"	10/10/98-10/15/98; 10/19/98-10/25/98	3/19/98	11/5/98	☐	☑
"Taxes"	CA-01	Frank Riggs & Michela Alioto	☐	Tax Fairness	"When it comes to taxes, there is a difference. Call and find out." "Voter Information for Working Families 1-888-235-3483"	10/10/98-10/15/98; 10/19/98-10/25/98; 10/26/98-11/5/98	3/26/98	11/5/98	☐	☑
"Taxes"	CA-22	Andrea Seastrand & Walter Capps	☐	Tax Fairness	"When it comes to taxes, there is a difference. Call and find out." "Voter Information for Working Families 1-888-235-3483"	10/10/98-10/15/98; 10/16/98-10/25/98; 10/26/98-11/5/98	3/26/98	11/5/98	☐	☑
"Taxes"	GA-08	Bax Chambliss & Jim Wiggins	☐	Tax Fairness	"When it comes to taxes, there is a difference. Call and find out." "Voter Information for Working Families 1-888-235-3483"	10/10/98-10/15/98; 10/16/98-10/25/98; 10/26/98-11/5/98	7/8/98	11/5/98	☐	☑

528

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type Pictured in italic type	Radio?	Issue(s) Discussed	Call to Action Audio in normal type Video in italic type	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"Medicare"	OK-02	Tom Coburn & Glen Johnson	☐	Medicare Funding	"When it comes to Medicare there is a difference. Call and find out." "Voter Information for Working Families 1-888-235-3483"	9/28/98-10/5/98; 10/10/98-10/15/98	6/27/98	11/5/98	☐	☑
"Medicare"	PA-21	Phil English & Ron Dilks	☐	Medicare Funding	"When it comes to Medicare there is a difference. Call and find out." "Voter Information for Working Families 1-888-235-3483"	9/28/98-10/5/98; 10/10/98-10/15/98	4/23/98	11/5/98	☐	☑
"Medicare"	TX-08	Steve Stockman & Nick Lampson	☐	Medicare Funding	"When it comes to Medicare there is a difference. Call and find out." "Voter Information for Working Families 1-888-235-3483"	9/28/98-10/5/98; 10/10/98-10/15/98	3/12/98	11/5/98	☐	☑
"Medicare"	WA-01	Rick White & Jeff Coopersmith	☐	Medicare Funding	"When it comes to Medicare there is a difference. Call and find out." "Voter Information for Working Families 1-888-235-3483"	9/25/98-10/5/98; 10/10/98-10/15/98	9/17/98	11/5/98	☐	☑
"Medicare"	NJ-09	Bill Martini & Bill Pascrell	☐	Medicare Funding	"When it comes to Medicare there is a difference. Call and find out." "Voter Information for Working Families 1-888-235-3483"	9/28/98-10/5/98; 10/10/98-10/15/98	6/4/98	11/5/98	☐	☑
"Medicare"	OH-10	Martin Hoke & Dennis Kucinich	☐	Medicare Funding	"When it comes to Medicare there is a difference. Call and find out." "Voter Information for Working Families 1-888-235-3483"	9/28/98-10/5/98; 10/10/98-10/15/98	3/19/98	11/5/98	☐	☑
"Student"	TX-08	Steve Stockman & Nick Lampson	☐	Education Funding	"When it comes to education, there is a difference. Call and find out." "Voter Information for Working Families 1-888-235-3483"	10/1/98-10/14/98	3/12/98	11/5/98	☐	☑
"Taxes"	WA-08	Randy Tate & Adam Smith	☐	Tax Fairness	"When it comes to taxes, there is a difference. Call and find out." "Voter Information for Working Families 1-888-235-3483"	10/10/98-10/15/98; 10/16/98-10/25/98; 10/26/98-11/5/98	9/17/98	11/5/98	☐	☑
"Taxes"	WA-02	Jack Metcalf & Kevin Quigley	☐	Tax Fairness	"When it comes to taxes, there is a difference. Call and find out." "Voter Information for Working Families 1-888-235-3483"	10/19/98-10/25/98; 10/26/98-11/5/98	9/17/98	11/5/98	☐	☑
"Taxes"	WA-01	Rick White & Jeff Coopersmith	☐	Tax Fairness	"When it comes to taxes, there is a difference. Call and find out." "Voter Information for Working Families 1-888-235-3483"	10/10/98-10/15/98; 10/19/98-10/25/98; 10/26/98-11/5/98	9/17/98	11/5/98	☐	☑

527

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Taxes"	NY-26	Jim Walsh & Marty Mack	☐	Tax Fairness	"When it comes to taxes, there is a difference. Call and find out." "Voter Information for Working Families 1-888-235-3463"	10/10/98-10/15/98; 10/16/98-10/25/98	9/10/98	11/3/98	☐	☑
"Taxes"	NY-01	John Enalgo & Bob Coffin	☐	Tax Fairness	"When it comes to taxes, there is a difference. Call and find out." "Voter Information for Working Families 1-888-235-3463"	10/10/98-10/15/98; 10/16/98-10/25/98; 10/26/98-11/3/98	9/3/98	11/3/98	☐	☑
"Taxes"	NJ-08	Bill Martini & Bill Pascrell	☐	Tax Fairness	"When it comes to taxes, there is a difference. Call and find out." "Voter Information for Working Families 1-888-235-3463"	10/10/98-10/15/98; 10/16/98-10/25/98	6/4/98	11/3/98	☐	☑
"Taxes"	OR-05	Jim Bunn & Darlene Hooley	☐		"When it comes to taxes, there is a difference. Call and find out." "Voter Information for Working Families 1-888-235-3463"	10/10/98-10/15/98; 10/16/98-10/25/98; 10/26/98-11/3/98	5/21/98	11/3/98	☐	☑
"Taxes"	MT-AL	Rick Hill & Bill Yellowtail	☐	Tax Fairness	"When it comes to taxes, there is a difference. Call and find out." "Voter Information for Working Families 1-888-235-3463"	10/21/98-11/3/98; 11/1/98-11/3/98	6/4/98	11/3/98	☐	☑
"Taxes"	IL-20	John Shimkus & Jay Hoffman	☐	Tax Fairness	"When it comes to taxes, there is a difference. Call and find out." "Voter Information for Working Families 1-888-235-3463"	10/21/98-11/3/98	3/10/98	11/3/98	☐	☑
"Taxes"	MA-06	Peter Torkildsen & John Tierney	☑	Tax Fairness	"When it comes to taxes, there is a difference. Call and find out."	10/10/98-10/15/98; 10/16/98-10/25/98; 10/26/98-11/3/98	9/17/98	11/3/98	☐	☑
"Taxes"	NC-02	David Funderburk & Bob Etheridge	☑		"When it comes to taxes, there is a difference. Call and find out."	10/10/98-10/15/98; 10/16/98-10/25/98; 10/26/98-11/3/98	5/7/98	11/3/98	☐	☑
"Taxes"	KY-01	Edward Whitfield & Dennis Null	☑		"When it comes to taxes, there is a difference. Call and find out."	10/10/98-10/15/98; 10/16/98-10/25/98; 10/26/98-11/3/98	5/26/98	11/3/98	☐	☑

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Taxes"	TX-08	Steve Stockman & Nick Lampson	☐	Tax Fairness	"When it comes to taxes, there is a difference. Call and find out." "Voter Information for Working Families 1-888-235-3463"	10/10/98-10/15/98; 10/16/98-10/25/98	3/12/98	11/3/98	☐	☑
"Taxes"	IA-04	Greg Ganske & Connie McBurnery	☐	Tax Fairness	"When it comes to taxes, there is a difference. Call and find out." "Voter Information for Working Families 1-888-235-3463"	10/10/98-10/15/98; 10/16/98-10/25/98; 10/26/98-11/3/98	6/4/98	11/3/98	☐	☑
"Taxes"	WI-08	John Hostettler & Jonathan Weinzapfel	☐	Tax Fairness	"When it comes to taxes, there is a difference. Call and find out." "Voter Information for Working Families 1-888-235-3463"	10/10/98-10/15/98; 10/16/98-10/25/98; 10/26/98-11/3/98	5/7/98	11/3/98	☐	☑
"Taxes"	KY-01	Edward Whitfield & Dennis Null	☐	Tax Fairness	"When it comes to taxes, there is a difference. Call and find out." "Voter Information for Working Families 1-888-235-3463"	10/10/98-10/15/98; 10/16/98-10/25/98; 10/26/98-11/3/98	5/26/98	11/3/98	☐	☑
"Taxes"	ME-01	James Longley & Tom Allen	☐	Tax Fairness	"When it comes to taxes, there is a difference. Call and find out." "Voter Information for Working Families 1-888-235-3463"	10/10/98-10/15/98; 10/26/98-11/3/98	6/11/98	11/3/98	☐	☑
"Taxes"	NC-02	David Funderburk & Bob Etheridge	☐	Tax Fairness	"When it comes to taxes, there is a difference. Call and find out." "Voter Information for Working Families 1-888-235-3463"	10/10/98-10/15/98; 10/16/98-10/25/98; 10/26/98-11/3/98	5/7/98	11/3/98	☐	☑
"Taxes"	NH-02	Charles Bass & Annie Arness	☐	Tax Fairness	"When it comes to taxes, there is a difference. Call and find out." "Voter Information for Working Families 1-888-235-3463"	10/10/98-10/15/98; 10/16/98-10/25/98; 10/26/98-11/3/98	9/10/98	11/3/98	☐	☑
"Taxes"	OH-01	Steve Chabot & Mark Longabaugh	☐	Tax Fairness	"When it comes to taxes, there is a difference. Call and find out." "Voter Information for Working Families 1-888-235-3463"	10/10/98-10/15/98; 10/16/98-10/25/98	3/10/98	11/3/98	☐	☑
"Taxes"	GA-10	Charlie Norwood & David Bell	☐	Tax Fairness	"When it comes to taxes, there is a difference. Call and find out." "Voter Information for Working Families 1-888-235-3463"	10/10/98-10/15/98	7/28/98	11/3/98	☐	☑

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Home"	NV-01	John Ensign & Bob Coffin	☐	Health Care Costs	"When it comes to protecting families, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	10/16/98-10/25/98; 10/28/98-11/5/98	9/2/98	11/5/98	☐	☑
"Home"	IA-04	Greg Ganske & Connie McBurney	☐	Health Care Costs	"When it comes to protecting families, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	10/16/98-10/25/98; 10/28/98-11/5/98	6/4/98	11/5/98	☐	☑
"Home"	AZ-06	J. D. Hayworth & Steve Owen	☐	Health Care Costs	"When it comes to protecting families, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	10/16/98-10/25/98; 10/28/98-11/5/98	9/10/98	11/5/98	☐	☑
"Home"	OH-10	Martin Hoke & Dennis Kucinich	☐	Health Care Costs	"When it comes to protecting families, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	10/16/98-10/25/98	3/10/98	11/5/98	☐	☑
"Home"	IN-08	John Hostettler & Jonathon Weinzapfel	☐	Health Care Costs	"When it comes to protecting families, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	10/16/98-10/25/98; 10/28/98-11/5/98	5/7/98	11/5/98	☐	☑
"Home"	NJ-06	Bill Martini & Bill Pascrell	☐	Health Care Costs	"When it comes to protecting families, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	10/16/98-10/25/98	6/4/98	11/5/98	☐	☑
"Home"	WA-02	Jack Metcalf & Kevin Quigley	☐	Health Care Costs	"When it comes to protecting families, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	10/16/98-10/25/98; 10/28/98-11/5/98	9/17/98	11/5/98	☐	☑
"Home"	CA-01	Frank Riggs & Michela Alioto	☐	Health Care Costs	"When it comes to protecting families, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	10/16/98-10/25/98; 10/28/98-11/5/98	3/26/98	11/5/98	☐	☑
"Home"	ID-01	Helen Chenoweth & Dan Williams	☐	Health Care Costs	"When it comes to protecting families, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	10/16/98-10/25/98; 10/28/98-11/5/98	5/26/98	11/5/98	☐	☑
"Home"	NH-02	Charles Bass & Annie Arnone	☐	Health Care Costs	"When it comes to protecting families, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	10/16/98-10/25/98; 10/28/98-11/5/98	9/10/98	11/5/98	☐	☑

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Taxes"	IN-08	John Hostettler & Jonathon Weinzapfel	☑		"When it comes to taxes, there is a difference. Call and find out."	10/10/98-10/15/98; 10/16/98-10/25/98; 10/28/98-11/5/98	5/7/98	11/5/98	☐	☑
"Taxes"	GA-08	Saxi Chambliss & Jim Wiggins	☑		"When it comes to taxes, there is a difference. Call and find out."	10/10/98-10/15/98; 10/16/98-10/25/98; 10/28/98-11/5/98	7/9/98	11/5/98	☐	☑
"Taxes"	TX-06	Steve Stockman & Nick Lampson	☑		"When it comes to taxes, there is a difference. Call and find out."	10/10/98-10/15/98; 10/16/98-10/25/98	3/12/98	11/5/98	☐	☑
"Taxes"	CA-01	Frank Riggs & Michela Alioto	☑		"When it comes to taxes, there is a difference. Call and find out."	10/10/98-10/15/98; 10/16/98-10/25/98; 10/28/98-11/5/98	3/26/98	11/5/98	☐	☑
"Homes"	OR-06	Darlene Hooley & Jim Bunn	☐	Health Care Costs	"When it comes to protecting families, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	10/16/98-10/25/98; 10/28/98-11/5/98	5/21/98	11/5/98	☐	☑
"Homes"	GA-08	Jim Wiggins & Saxi B. Chambliss	☐	Health Care Costs	"When it comes to protecting families, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	10/16/98-10/25/98	7/9/98	11/5/98	☐	☑
"Homes"	NC-02	Bob Etheridge & David Funderburk	☐	Health Care Costs	"When it comes to protecting families, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	10/16/98-10/25/98; 10/28/98-11/5/98	5/7/98	11/5/98	☐	☑
"Homes"	NY-25	Marty Mack & Jim Walsh	☐	Health Care Costs	"When it comes to protecting families, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	10/16/98-10/25/98	9/10/98	11/5/98	☐	☑
"Home"	CA-01	Frank Riggs & Michela Alioto	☑	Health Care Costs	"When it comes to protecting families, there is a difference. Call and find out."	10/16/98-10/25/98; 10/28/98-11/5/98	3/26/98	11/5/98	☐	☑
"Home"	PA-21	Phil English & Ron DiNicola	☐	Health Care Costs	"When it comes to protecting families, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	10/16/98-10/25/98; 10/28/98-11/5/98	4/23/98	11/5/98	☐	☑

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate: Named in normal type; Pictured in italic type	Radio?	Issue(s) Discussed	Call to Action: Audio in normal type; Video in italic type	Dates: Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Home"	WA-09	Randy Tate & Adam Smith	☐	Health Care Costs	"When it comes to protecting families, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3463"*	10/19/98-10/25/98; 10/28/98-11/5/98	9/17/98	11/5/98	☐	☑
"Home"	MA-08	Peter Torkildsen & John Tierney	☑	Health Care Costs	"When it comes to protecting families, there is a difference. Call and find out."	10/19/98-10/25/98; 10/28/98-11/5/98	9/17/98	11/5/98	☐	☑
"Home"	OR-05	Darlene Hooley & Jim Bunn	☑		"When it comes to protecting families, there is a difference. Call and find out."	10/19/98-10/25/98; 10/28/98-11/5/98	5/21/98	11/5/98	☐	☑
"Taxes"	OR-05	Jim Bunn & Darlene Hooley	☑		"When it comes to taxes, there is a difference. Call and find out."	10/19/98-10/25/98; 10/28/98-11/5/98	5/21/98	11/5/98	☐	☑
"Home"	MN-01	Gil Gutknecht & Mary Rieder	☐	Health Care Costs	"When it comes to protecting families, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3463"*	10/25/98-11/5/98	9/10/98	11/5/98	☐	☑
"Home"	MN-8m	Paul Wellstone & Rudy Boschwitz	☐	Health Care Costs	"When it comes to protecting families, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3463"*	10/25/98-11/5/98	9/10/98	11/5/98	☐	☑
"Home"	OH-10	Steve LaTourette & Tom Coyne]	☐	Health Care Costs	"When it comes to protecting families, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3463"*	10/25/98-11/5/98	3/10/98	11/5/98	☐	☑
"Home"	MN-01	Gil Gutknecht & Mary Rieder	☑	Health Care Costs	"When it comes to protecting families, there is a difference. Call and find out."	10/25/98-11/5/98	9/10/98	11/5/98	☐	☑
"Taxes"	WI-01	Mark Neumann & Lydia Spotswood	☐	Tax Fairness	"When it comes to taxes, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3463"*	10/23/98-11/5/98	9/10/98	11/5/98	☐	☑
"Home"	WI-01	Mark Neumann & Lydia Spotswood]	☐	Health Care Costs	"When it comes to protecting families, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3463"*	10/23/98-11/5/98	9/10/98	11/5/98	☐	☑

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate: Named in normal type; Pictured in italic type	Radio?	Issue(s) Discussed	Call to Action: Audio in normal type; Video in italic type	Dates: Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Home"	TX-09	Steve Stockman & Nick Lampson	☑	Health Care Costs	"When it comes to protecting families, there is a difference. Call and find out."	10/15/98-10/19/98	3/12/98	11/5/98	☐	☑
"Home"	IN-08	John Hostettler & Jonathan Weinzapfel	☑	Health Care Costs	"When it comes to protecting families, there is a difference. Call and find out."	10/19/98-10/25/98; 10/28/98-11/5/98	5/7/98	11/5/98	☐	☑
"Home"	KY-01	Edward Whitfield & Dennis Hull	☐	Health Care Costs	"When it comes to protecting families, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3463"*	10/19/98-10/25/98; 10/28/98-11/5/98	5/26/98	11/5/98	☐	☑
"Home"	WA-01	Rick White & Jeff Coopersmith	☐	Health Care Costs	"When it comes to protecting families, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3463"*	10/19/98-10/25/98; 10/28/98-11/5/98	9/17/98	11/5/98	☐	☑
"Home"	KY-01	Edward Whitfield & Dennis Hull	☑	Health Care Costs	"When it comes to protecting families, there is a difference. Call and find out."	10/19/98-10/25/98; 10/28/98-11/5/98	5/26/98	11/5/98	☐	☑
"Homes"	GA-08	Jim Wiggins & Saxby Chambliss	☑		"When it comes to protecting families, there is a difference. Call and find out."	10/19/98-10/25/98	7/8/98	11/5/98	☐	☑
"Home"	OH-01	Steve Chabot & Mark Longabaugh	☐	Health Care Costs	"When it comes to protecting families, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3463"*	10/19/98-10/25/98	3/10/98	11/5/98	☐	☑
"Home"	CA-22	Andrea Seastrand & Walter Capps	☐	Health Care Costs	"When it comes to protecting families, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3463"*	10/19/98-10/25/98; 10/28/98-11/5/98	3/26/98	11/5/98	☐	☑
"Homes"	NC-02	Bob Etheridge & David Funderburk	☑		"When it comes to protecting families, there is a difference. Call and find out."	10/19/98-10/25/98; 10/28/98-11/5/98	5/7/98	11/5/98	☐	☑
"Home"	TX-09	Steve Stockman & Nick Lampson	☐	Health Care Costs	"When it comes to protecting families, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3463"*	10/15/98-10/19/98; 10/19/98-10/25/98	3/12/98	11/5/98	☐	☑

536

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate: Named in normal type, Pictured in italic type	Radio?	Issue(s) Discussed	Call to Action: Audio in normal type, Video in italic type	Dates: Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"Taxes"	OH-08	Frank Cremeans & Ted Strickland	☐	Tax Fairness	"When it comes to taxes, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	10/30/98-11/5/98	3/19/98	11/5/98	☐	☑
"Home"	OH-08	Frank Cremeans & Ted Strickland	☐	Health Care Costs	"When it comes to protecting families, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	10/30/98-11/5/98	3/19/98	11/5/98	☐	☑
"Values"	SD-AL	John Thune	☐	Education Funding; Tax Fairness	"Call Congressman Thune. Tell him to protect our kids, not special interests. Let's make the right choice for working families." *"Call Congressman Thune -- [local telephone]"*	4/1/97-4/7/97	1998	1998	☐	☐
"Values"	AR-04	Jay Dickey	☐	Education Funding; Tax Fairness	"Call Congressman Dickey. Tell him to protect our kids, not special interests. Let's make the right choice for working families." *"Call Congressman Dickey -- [local telephone]"*	4/1/97-4/7/97	1998	1998	☐	☐
"Values"	MO-09	Kenny Hulshof	☑		"Call Congressman Hulshof. Tell him to protect our kids, not special interests. Let's make the right choice for working families." *"Call Congressman Hulshof -- [local telephone]"*	4/1/97-4/7/97	1998	1998	☐	☐
"Values"	AL-04	Robert Aderholt	☐	Education Funding; Tax Fairness	"Call Congressman Aderholt. Tell him to protect our kids, not special interests. Let's make the right choice for working families." *"Call Congressman Aderholt -- [local telephone]"*	4/1/97-4/7/97	1998	1998	☐	☐
"Values"	WI-01	Mark Neumann	☐	Education Funding; Tax Fairness	"Call Congressman Neumann. Tell him to protect our kids, not special interests. Let's make the right choice for working families." *"Call Congressman Neumann -- [local telephone]"*	4/1/97-4/7/97	1998	1998	☐	☐
"Values"	WA-03	Linda Smith	☐	Education Funding; Tax Fairness	"Call Congressman Smith. Tell him to protect our kids, not special interests. Let's make the right choice for working families." *"Call Congressman Smith -- [local telephone]"*	4/1/97-4/7/97	1998	1998	☐	☐
"Values"	VA-05	Virgil Goode	☐	Education Funding; Tax Fairness	"Call Congressman Goode. Tell him to protect our kids, not special interests. Let's make the right choice for working families." *"Call Congressman Goode -- [local telephone]"*	4/1/97-4/7/97	1998	1998	☐	☐
"Values"	TN-09	James Malaney	☐	Education Funding; Tax Fairness	"Call Congressman Tanner. Tell him to protect our kids, not special interests. Let's make the right choice for working families." *"Call Congressman Tanner -- [local telephone]"*	4/1/97-4/7/97	1998	1998	☐	☐

535

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate: Named in normal type, Pictured in italic type	Radio?	Issue(s) Discussed	Call to Action: Audio in normal type, Video in italic type	Dates: Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"Taxes"	FL-15	Dave Weldon & John Byron	☐	Tax Fairness	"When it comes to taxes, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	10/28/98-11/5/98	9/3/98	11/5/98	☐	☑
"Taxes"	MN-Sen	Paul Wellstone & Rudy Boschwitz	☐	Tax Fairness	"When it comes to taxes, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	10/25/98-11/5/98	9/10/98	11/5/98	☐	☑
"Taxes"	MN-01	Gil Gutknecht & Mary Rieder	☑	Tax Fairness	"When it comes to taxes, there is a difference. Call and find out."	10/25/98-11/5/98	9/10/98	11/5/98	☐	☑
"Home"	MN-Sen	Paul Wellstone & Rudy Boschwitz	☑	Health Care Costs	"When it comes to protecting families, there is a difference. Call and find out."	10/25/98-11/5/98	9/10/98	11/5/98	☐	☑
"Home"	FL-15	Dave Weldon & John Byron	☐	Health Care Costs	"When it comes to protecting families, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	10/25/98-11/5/98	9/3/98	11/5/98	☐	☑
"Taxes"	MI-08	Dick Chrysler & Debbie Stabenow	☐	Tax Fairness	"When it comes to taxes, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	10/25/98-11/5/98	8/8/98	11/5/98	☐	☑
"Taxes"	MN-Sen	Paul Wellstone & Rudy Boschwitz	☑	Tax Fairness	"When it comes to taxes, there is a difference. Call and find out."	10/25/98-11/5/98	9/10/98	11/5/98	☐	☑
"Taxes"	OH-19	Steve LaTourette & Tom Coyne	☐	Tax Fairness	"When it comes to taxes, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	10/25/98-11/5/98	3/19/98	11/5/98	☐	☑
"Taxes"	MN-01	Gil Gutknecht & Mary Rieder	☐	Tax Fairness	"When it comes to taxes, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	10/25/98-11/5/98	9/10/98	11/5/98	☐	☑
"Home"	MI-08	Dick Chrysler & Debbie Stabenow	☐	Health Care Costs	"When it comes to protecting families, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	10/25/98-11/5/98	8/8/98	11/5/98	☐	☑
"Home"	ME-01	James Longley & Tom Allen	☐	Health Care Costs	"When it comes to protecting families, there is a difference. Call and find out." *"Voter Information for Working Families 1-888-235-3467"*	10/29/98-11/5/98	9/11/98	11/5/98	☐	☑

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate: Named in normal type, Pictured in italic type	Radio?	Issue(s) Discussed	Call to Action: Audio in normal type, Video in italic type	Dates: Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"Values"	TX-17	Charles Stenholm	☐	Education Funding; Tax Fairness	"Call Congressman Stenholm. Tell him to protect our kids, not special interests. Let's make the right choice for working families." *"Call Congressman Stenholm – [local telephone]"*	4/1/97-4/7/97	1998	1998	☐	☐
"Values"	CA-01	Frank Riggs	☑		"Call Congressman Tiahrt. Tell him to protect our kids, not special interests. Let's make the right choice for working families."	4/1/97-4/7/97	1998	1998	☐	☐
"Gut"	FL-Sen	Bob Graham	☑	Comp. Time	"Before Senator Bob Graham votes, he needs to hear from you. Call Senator Graham at [800-number], tell him to vote no on 84, the Ashcroft Comp Time law."	5/10/97-5/14/97	1998	1998	☐	☐
"Gut"	NH-Sen	Judd Gregg	☑	Comp. Time	"Senator Judd Gregg voted in favor of this scheme. Call Gregg at [80 number] This time tell him to do the right thing for Ohio's working families by voting no."	5/10/97-5/14/97	1998	1998	☐	☐
"Gut"	AR-Sen	Tim Hutchinson	☑	Comp. Time	"Senator Tim Hutchinson voted in favor of this scheme. Call Hutchinson at [800-number] This time tell him to do the right thing for Ohio's working families by voting no."	5/10/97-5/14/97	2002	2002	☐	☐
"Gut"	LA-Sen	John Breaux & Mary Landrieu	☑	Comp. Time	"Before Senators John Breaux and Mary Landrieu votes, he needs to hear from you. Call Senators Breaux and Landrieu at [800-number], tell him to vote no on 84, the Ashcroft Comp Time law."	5/10/97-5/14/97	1998, 2002	1998, 2002	☐	☐
"Gut"	VA-Sen	Chuck Robb	☑	Comp. Time	"Before Senator Chuck Robb votes, he needs to hear from you. Call Senator Robb at [800-number], tell him to vote no on 84, the Ashcroft Comp Time law."	5/10/97-5/14/97	2000	2000	☐	☐
"Gut"	OH-Sen	Mike DeWine	☑	Comp. Time	"Senator Mike DeWine voted in favor of this scheme. Call DeWine at [800-number] This time tell him to do the right thing for Ohio's working families by voting no."	5/10/97-5/14/97	2000	2000	☐	☐
"Everybody"	RI-Sen	John Chafee & Newt Gingrich	☑	Minimum Wage	"Now they're trying to chip away at it. Don't let them do it. Call Congressman Chafee at [800-number] Tell him to protect the minimum wage and stand up for working families. Tell him, one minimum wage for everybody."	5/19/97-5/23/97	2000	2000	☐	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate: Named in normal type, Pictured in italic type	Radio?	Issue(s) Discussed	Call to Action: Audio in normal type, Video in italic type	Dates: Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"Values"	NH-02	Charlie Bass	☐	Education Funding; Tax Fairness	"Call Congressman Bass. Tell him to protect our kids, not special interests. Let's make the right choice for working families." *"Call Congressman Bass – [local telephone]"*	4/1/97-4/7/97	1998	1998	☐	☐
"Values"	NY-01	John Ensign	☐	Education Funding; Tax Fairness	"Call Congressman Ensign. Tell him to protect our kids, not special interests. Let's make the right choice for working families." *"Call Congressman Ensign – [local telephone]"*	4/1/97-4/7/97	1998	1998	☐	☐
"Values"	NC-07	Mike McIntyre	☐	Education Funding; Tax Fairness	"Call Congressman McIntyre. Tell him to protect our kids, not special interests. Let's make the right choice for working families." *"Call Congressman McIntyre – [local telephone]"*	4/1/97-4/7/97	1998	1998	☐	☐
"Values"	MO-09	Kenny Hulshof	☐	Education Funding; Tax Fairness	"Call Congressman Hulshof. Tell him to protect our kids, not special interests. Let's make the right choice for working families." *"Call Congressman Hulshof – [local telephone]"*	4/1/97-4/7/97	1998	1998	☐	☐
"Values"	LA-07	Chris John	☐	Education Funding; Tax Fairness	"Call Congressman John. Tell him to protect our kids, not special interests. Let's make the right choice for working families." *"Call Congressman John – [local telephone]"*	4/1/97-4/7/97	1998	1998	☐	☐
"Values"	KS-04	Todd Tiahrt	☐	Education Funding; Tax Fairness	"Call Congressman Tiahrt. Tell him to protect our kids, not special interests. Let's make the right choice for working families." *"Call Congressman Tiahrt – [local telephone]"*	4/1/97-4/7/97	1998	1998	☐	☐
"Values"	IN-08	John Hostettler	☐	Education Funding; Tax Fairness	"Call Congressman Hostettler. Tell him to protect our kids, not special interests. Let's make the right choice for working families." *"Call Congressman Hostettler – [local telephone]"*	4/1/97-4/7/97	1998	1998	☐	☐
"Values"	FL-02	Allen Boyd	☐	Education Funding; Tax Fairness	"Call Congressman Boyd. Tell him to protect our kids, not special interests. Let's make the right choice for working families." *"Call Congressman Boyd – [local telephone]"*	4/1/97-4/7/97	1998	1998	☐	☐
"Values"	CA-17	Sam Farr	☐	Education Funding; Tax Fairness	"Call Congressman Farr. Tell him to protect our kids, not special interests. Let's make the right choice for working families." *"Call Congressman Farr – [local telephone]"*	4/1/97-4/7/97	1998	1998	☐	☐
"Values"	CA-01	Frank Riggs	☐	Education Funding; Tax Fairness	"Call Congressman Riggs. Tell him to protect our kids, not special interests. Let's make the right choice for working families." *"Call Congressman Riggs – [local telephone]"*	4/1/97-4/7/97	1998	1998	☐	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"Fairness"	MO-09	Kenny Hulshof	☐	Minimum Wage	"Call Congressman Hulshof. Tell him to fight for fairness. One minimum wage for everybody." *"Call Congressman Hulshof – [800-number]"*	6/18/97-6/24/97	1998	1998	☐	☐
"Fairness"	WI-01	Mark Neumann	☐	Minimum Wage	"Call Congressman Neumann. Tell him to fight for fairness. One minimum wage for everybody." *"Call Congressman Neumann – [800-number]"*	6/18/97-6/24/97	1998	1998	☐	☐
"Fairness"	PA-Sen	Rick Santorum	☐	Minimum Wage	"Call Senator Santorum. Tell him to fight for fairness. One minimum wage for everybody." *"Call Senator Santorum – [800-number]"*	6/18/97-6/24/97	2000	2000	☐	☐
"Fairness"	NY-01	John Ensign	☐	Minimum Wage	"Call Congressman Ensign. Tell him to fight for fairness. One minimum wage for everybody." *"Call Congressman Ensign – [800-number]"*	6/18/97-6/24/97	1998	1998	☐	☐
"Fairness"	WA-03	Linda Smith	☐	Minimum Wage	"Call Congressman Smith. Tell him to fight for fairness. One minimum wage for everybody." *"Call Congressman Smith – [800-number]"*	6/18/97-6/24/97	1998	1998	☐	☐
"Fairness"	CA-01	Frank Riggs	☐	Minimum Wage	"Call Congressman Riggs. Tell him to fight for fairness. One minimum wage for everybody." *"Call Congressman Riggs – [800-number]"*	6/18/97-6/24/97	1998	1998	☐	☐
"Fairness"	AR-04	Jay Dickey	☐	Minimum Wage	"Call Congressman Dickey. Tell him to fight for fairness. One minimum wage for everybody." *"Call Congressman Dickey – [800-number]"*	6/18/97-6/24/97	1998	1998	☐	☐
"Payback"	NY-01	John Ensign, Newt Gingrich, Bill Clinton	☑	Tax Fairness	"Before he votes, Congressman Ensign needs to hear from you. Call Congressman Ensign at [800-number] and tell him to vote no on this tax plan. Tell Congressman Ensign to put working families first"	6/24/97-6/29/97	1998	1998	☐	☐
"Payback"	MN-07	John Peterson, Newt Gingrich, & Bill Clinton	☑	Tax Fairness	"Before he votes, Congressman Peterson needs to hear from you. Call Congressman Peterson at [800-number] and tell him to vote no o this tax plan. Tell Congressman Peterson to put working families first	6/24/97-6/29/97	1998	1998	☐	☐
"Payback"	TX-04	Ron Hall, Newt Gingrich, & Bill Clinton	☑	Tax Fairness	"Before he votes, Congressman Hall needs to hear from you. Call Congressman Hall at [800-number] and tell him to vote no on this tax plan. Tell Congressman Hall to put working families first"	6/24/97-6/29/97	1998	1998	☐	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"Everybody"	ME-Sen	Susan Collins & Newt Gingrich	☑	Minimum Wage	"Now they're trying to chip away at it. Don't let them do it. Call Congressman Collins at [800-number] Tell him to protect the minimum wage and stand up for working families. Tell him, one minimum wage for everybody."	6/18/97-6/24/97	2002	2002	☐	☐
"Everybody"	AZ-06	J. D. Hayworth & Newt Gingrich	☑		"Now they're trying to chip away at it. Don't let them do it. Call Congressman Hayworth at [800-number] Tell him to protect the minimum wage and stand up for working families. Tell him, one minimum wage for everybody."	6/18/97-6/24/97	1998	1998	☐	☐
"Everybody"	FL-22	Clay Shaw & Newt Gingrich	☑	Minimum Wage	"Now they're trying to chip away at it. Don't let them do it. Call Congressman Shaw at [800-number] Tell him to protect the minimu wage and stand up for working families. Tell him, one minimum wag for everybody."	6/18/97-6/24/97	1998	1998	☐	☐
"Everybody"	MO-09	Kenny Hulshof & Newt Gingrich	☑	Minimum Wage	"Now they're trying to chip away at it. Don't let them do it. Call Congressman Hulshof at [800-number] Tell him to protect the minimum wage and stand up for working families. Tell him, one minimum wage for everybody."	6/18/97-6/24/97	1998	1998	☐	☐
"Everybody"	CA-01	Frank Riggs & Newt Gingrich	☑	Minimum Wage	"Now they're trying to chip away at it. Don't let them do it. Call Congressman Riggs at [800-number] Tell him to protect the minimu wage and stand up for working families. Tell him, one minimum wag for everybody."	6/18/97-6/24/97	1998	1998	☐	☐
"Everybody"	PA-Sen	Rick Santorum & Newt Gingrich	☑	Minimum Wage	"Now they're trying to chip away at it. Don't let them do it. Call Congressman Santorum at [800-number] Tell him to protect the minimum wage and stand up for working families. Tell him, one minimum wage for everybody."	6/18/97-6/24/97	2000	2000	☐	☐
"Fairness"	IA-02	Jim Nussle	☐	Minimum Wage	"Call Congressman Nussle. Tell him to fight for fairness. One minimum wage for everybody." *"Call Congressman Nussle – [800-number]"*	6/18/97-6/24/97	1998	1998	☐	☐
"Fairness"	AZ-06	J.D. Hayworth	☐	Minimum Wage	"Call Congressman Hayworth. Tell him to fight for fairness. One minimum wage for everybody." *"Call Congressman Hayworth – [800-number]"*	6/18/97-6/24/97	1998	1998	☐	☐

542

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Paycheck"	AZ-06	J.D. Hayworth, Newt Gingrich, & Bill Clinton	☑	Tax Fairness	"Before he votes, Congressman Hayworth needs to hear from you. Call Congressman Hayworth at [800-number] and tell him to vote no this tax plan. Tell Congressman Hayworth to put working families fire	9/24/97-9/26/97	1998	1998	☐	☐
"Paycheck"	NY-16 NY-02	Sue Kelly, Rick Lazio, Newt Gingrich, Bill Clinton	☑	Tax Fairness	"Before he votes, Congressman Kelly and Lazio needs to hear from you. Call Congressman Kelly and Lazio at [800-number] and tell him vote no on this tax plan. Tell Congressman Kelly and Lazio to put working families first"	9/24/97-9/26/97	1998	1998	☐	☐
"Paycheck"	CT-05 CT-04	Gary Franks, Chris Shays, Newt Gingrich, & Bill Clinton	☑	Tax Fairness	"Before he votes, Congressmen Franks and Shays need to hear from you. Call Congressmen Franks and Shays at [800-number] and tell him to vote no on this tax plan. Tell Congressmen Franks and Shays to put working families first"	9/24/97-9/26/97	1998	1998	☐	☐
"Paycheck"	CA-20	Cal Dooley, Newt Gingrich, & Bill Clinton	☑	Tax Fairness	"Before he votes, Congressman Dooley needs to hear from you. Call Congressman Dooley at [800-number] and tell him to vote no on this tax plan. Tell Congressman Dooley to put working families first"	9/24/97-9/26/97	1998	1998	☐	☐
"Paycheck"	NE-02	Jon Christensen, Newt Gingrich, & Bill Clinton	☑	Tax Fairness	"Before he votes, Congressman Christensen needs to hear from you. Call Congressman Christensen at [800-number] and tell him to vote n on this tax plan. Tell Congressman Christensen to put working families first"	9/24/97-9/26/97	1998	1998	☐	☐
"Paycheck"	OH-18	Bob Ney, Newt Gingrich, Bill Clinton	☑	Tax Fairness	"Before he votes, Congressman Ney needs to hear from you. Call Congressman Ney at [800-number] and tell him to vote no on this tax plan. Tell Congressman Ney to put working families first"	9/24/97-9/26/97	1998	1998	☐	☐
"Paycheck"	OH-10	Steve Latourette, Newt Gingrich, Bill Clinton	☑	Tax Fairness	"Before he votes, Congressman Latourette needs to hear from you. Call Congressman Latourette at [800-number] and tell him to vote no on this tax plan. Tell Congressman Latourette to put working families first"	9/24/97-9/26/97	1998	1998	☐	☐
"Paycheck"	NY-02	Jim Gibbons, Newt Gingrich, & Bill Clinton	☑	Tax Fairness	"Before he votes, Congressman Gibbons needs to hear from you. C Congressman Gibbons at [800-number] and tell him to vote no on thi tax plan. Tell Congressman Gibbons to put working families first"	9/24/97-9/26/97	1998	1998	☐	☐

541

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Paycheck"	IN-08	John Hostettler, Newt Gingrich, & Bill Clinton	☑	Tax Fairness	"Before he votes, Congressman Hostettler needs to hear from you. Call Congressman Hostettler at [800-number] and tell him to vote no on this tax plan. Tell Congressman Hostettler to put working families first"	9/24/97-9/26/97	1998	1998	☐	☐
"Paycheck"	FL-15	Ileana Ros-Lehtinen, Newt Gingrich, & Bill Clinton	☑	Tax Fairness	"Before he votes, Congressman Rosselenina? needs to hear from you Call Congressman Rosselenina? at [800-number] and tell him to vote no on this tax plan. Tell Congressman Rosselenina? to put working families first"	9/24/97-9/26/97	1998	1998	☐	☐
"Paycheck"	KY-03	Anne Northup, Newt Gingrich, & Bill Clinton	☑	Tax Fairness	"Before she votes, Congressman Northup needs to hear from you. Call Congressman Northup at [800-number] and tell her to vote no on this tax plan. Tell Congressman Northup to put working families first"	9/24/97-9/26/97	1998	1998	☐	☐
"Paycheck"	IL-11	Jerry Weller, Newt Gingrich, & Bill Clinton	☑	Tax Fairness	"Before he votes, Congressman Weller needs to hear from you. Call Congressman Weller at [800-number] and tell him to vote no on this tax plan. Tell Congressman Weller to put working families first"	9/24/97-9/26/97	1998	1998	☐	☐
"Paycheck"	WA-01	Rick White, Newt Gingrich, & Bill Clinton	☑	Tax Fairness	"Before he votes, Congressman White needs to hear from you. Call Congressman White at [800-number] and tell him to vote no on this t plan. Tell Congressman White to put working families first"	9/24/97-9/26/97	1998	1998	☐	☐
"Paycheck"	AR-04	Jay Dickey, Newt Gingrich, & Bill Clinton	☑	Tax Fairness	"Before he votes, Congressman Dickey needs to hear from you. Call Congressman Dickey at [800-number] and tell him to vote no on this tax plan. Tell Congressman Dickey to put working families first"	9/24/97-9/26/97	1998	1998	☐	☐
"Paycheck"	WI-01	Mark Neumann, Newt Gingrich, & Bill Clinton	☑	Tax Fairness	"Before he votes, Congressman Neumann needs to hear from you. Call Congressman Neumann at [800-number] and tell him to vote no on this tax plan. Tell Congressman Neumann to put working families first"	9/24/97-9/26/97	1998	1998	☐	☐
"Paycheck"	MO-09	Kenny Hulshof, Newt Gingrich, & Bill Clinton	☑	Tax Fairness	"Before he votes, Congressman Hulshof needs to hear from you. Call Congressman Hulshof at [800-number] and tell him to vote no on this tax plan. Tell Congressman Hulshof to put working families first"	9/24/97-9/26/97	1998	1998	☐	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Bad Vote"	IN-08	John Hostettler, Newt Gingrich, & Bill Clinton	☑	Tax Fairness	"Call Congressman Hostettler at (local #) and tell him to fix the plan and support tax cuts that will focus on us. Tell Congressman Hostettler, next time, put working families first"	7/1/97-7/3/97	1998	1998	☐	☐
"Bad Vote"	KY-03	Anne Northup, Newt Gingrich, & Bill Clinton	☑	Tax Fairness	"Call Congressman Northup at (local #) and tell her to fix the plan an support tax cuts that will focus on us. Tell Congressman Northup, next time, put working families first"	7/1/97-7/3/97	1998	1998	☐	☐
"Bad Vote"	OH-18	Bob Ney, Newt Gingrich, Bill Clinton	☑	Tax Fairness	"Call Congressman Ney at (local #) and tell him to fix the plan and support tax cuts that will focus on us. Tell Congressman Ney, next time, put working families first"	7/1/97-7/3/97	1998	1998	☐	☐
"Bad Vote"	NV-02	Jim Gibbons, Newt Gingrich, Bill Clinton	☑	Tax Fairness	"Call Congressman Gibbons at (local #) and tell him to fix the plan a support tax cuts that will focus on us. Tell Congressman Gibbons, next time, put working families first"	7/1/97-7/3/97	1998	1998	☐	☐
"Bad Vote"	MO-09	Kenny Hulshof, Newt Gingrich, & Bill Clinton	☑	Tax Fairness	"Call Congressman Hulshof at (local #) and tell him to fix the plan an support tax cuts that will focus on us. Tell Congressman Hulshof, nex time, put working families first"	7/1/97-7/3/97	1998	1998	☐	☐
"Bad Vote"	NV-01	John Ensign, Newt Gingrich, Bill Clinton	☑	Tax Fairness	"Call Congressman Ensign at (local #) and tell him to fix the plan and support tax cuts that will focus on us. Tell Congressman Ensign, nex time, put working families first"	7/1/97-7/3/97	1998	1998	☐	☐
"Bad Vote"	CA-20	Cal Dooley, Newt Gingrich, & Bill Clinton	☑	Tax Fairness	"Call Congressman Dooley at (local #) and tell him to fix the plan and support tax cuts that will focus on us. Tell Congressman Dooley, nex time, put working families first"	7/1/97-7/3/97	1998	1998	☐	☐
"Bad Vote"	LA-07	Chris John, Newt Gingrich, & Bill Clinton	☑	Tax Fairness	"Call Congressman John at (local #) and tell him to fix the plan and support tax cuts that will focus on us. Tell Congressman John, next time, put working families first"	7/1/97-7/3/97	1998	1998	☐	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Paycheck"	WA-03	Linda Smith, Newt Gingrich, Bill Clinton	☑	Tax Fairness	"Before he votes, Congressman Smith needs to hear from you. Call Congressman Smith at [800-number] and tell him to vote no on this l plan. Tell Congressman Smith to put working families first"	6/24/97-6/26/97	1998	1998	☐	☐
"Breaks"	NE-02	Bill Clinton & Jon Christensen	☐	Tax Fairness	"Call Congressman Christensen. Tell him to vote no and put working families first." *"Call Congressman Christensen – [800-number]"*	6/24/97-6/26/97	1998	1998	☐	☐
"Breaks"	NV-02	Bill Clinton & Jim Gibbons	☐	Tax Fairness	"Call Congressman Gibbons. Tell him to vote no and put working families first." *"Call Congressman Gibbons – [800-number]"*	6/24/97-6/26/97	1998	1998	☐	☐
"Breaks"	NV-01	Bill Clinton & John Ensign	☐	Tax Fairness	"Call Congressman Ensign. Tell him to vote no and put working families first. [800-number]" *"Call Congressman Ensign – [800-number]"*	6/24/97-6/26/97	1998	1998	☐	☐
"Breaks"	OH-18	Bill Clinton & Bob Ney	☐	Tax Fairness	"Call Congressman Ney. Tell him to vote no and put working families first." *"Call Congressman Ney – [800-number]"*	6/24/97-6/26/97	1998	1998	☐	☐
"Breaks"	KY-03	Bill Clinton & Anne Northup	☐	Tax Fairness	"Call Congressman Northup. Tell her to vote no and put working families first." *"Call Congressman Northup – [800-number]"*	6/24/97-6/26/97	1998	1998	☐	☐
"Breaks"	IN-08	Bill Clinton & John Hostettler	☐	Tax Fairness	"Call Congressman Hostettler. Tell him to vote no and put working families first." *"Call Congressman Hostettler – [800-number]"*	6/24/97-6/26/97	1998	1998	☐	☐
"Breaks"	AR-04	Bill Clinton & Jay Dickey	☐	Tax Fairness	"Call Congressman Dickey. Tell him to vote no and put working families first. [800-number]" *"Call Congressman Dickey – [800-number]"*	6/24/97-6/26/97	1998	1998	☐	☐
"Bad Vote"	VA-02	Owen Pickett, Newt Gingrich, Bill Clinton	☑	Tax Fairness	"Call Congressman Pickett at (local #) and tell him to fix the plan and support tax cuts that will focus on us. Tell Congressman Pickett, nex time, put working families first"	7/1/97-7/3/97	1998	1998	☐	☐
"Bad Vote"	MS-05	Gene Taylor, Newt Gingrich, & Bill Clinton	☑	Tax Fairness	"Call Congressman Taylor at (local #) and tell him to fix the plan and support tax cuts that will focus on us. Tell Congressman Taylor, next time, put working families first"	7/1/97-7/3/97	1998	1998	☐	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"Wrong"	AR-04	Bill Clinton, Newt Gingrich, Jay Dickey	☐	Tax Fairness	"Call Congressman Dickey. Tell him next time, put working families first" *"Call Congressman Dickey [local telephone]"*	7/1/97-7/3/97	1998	1998	☐	☐
"Wrong"	NV-01	Bill Clinton, Newt Gingrich, John Ensign	☐	Tax Fairness	"Call Congressman Ensign. Tell him next time, put working families first" *"Call Congressman Ensign [local telephone]"*	7/1/97-7/3/97	1998	1998	☐	☐
"Bad Vote"	AR-04	Jay Dickey, Newt Gingrich, & Bill Clinton	☑	Tax Fairness	"Call Congressman Dickey at (local #) and tell him to fix the plan and support tax cuts that will focus on us. Tell Congressman Dickey, next time, put working families first"	7/1/97-7/3/97	1998	1998	☐	☐
"Bad Vote"	TN-06	Bob Clement, Newt Gingrich, Bill Clinton	☑	Tax Fairness	"Call Congressman Clement at (local #) and tell him to fix the plan a support tax cuts that will focus on us. Tell Congressman Clement, next time, put working families first"	7/1/97-7/3/97	1998	1998	☐	☐
"Wrong"	OH-18	Bill Clinton, Newt Gingrich, Bob Ney	☐	Tax Fairness	"Call Congressman Ney. Tell him next time, put working families first *"Call Congressman Ney [local telephone]"*	7/1/97-7/3/97	1998	1998	☐	☐
"Wrong"	NV-02	Bill Clinton, Newt Gingrich, Jim Gibbons	☐	Tax Fairness	"Call Congressman Gibbons. Tell him next time, put working families first" *"Call Congressman Gibbons [local telephone]"*	7/1/97-7/3/97	1998	1998	☐	☐
"Wrong"	IN-08	Bill Clinton, Newt Gingrich, John Hostettler	☐	Tax Fairness	"Call Congressman Hostettler. Tell him next time, put working families first" *"Call Congressman Hostettler [local telephone]"*	7/1/97-7/3/97	1998	1998	☐	☐
"Wrong"	CA-20	Bill Clinton, Newt Gingrich, Cal Dooley	☐	Tax Fairness	"Call Congressman Dooley. Tell him next time, put working families first" *"Call Congressman Dooley [local telephone]"*	7/1/97-7/3/97	1998	1998	☐	☐
"Wrong"	MO-09	Bill Clinton, Newt Gingrich, Kenny Hulshof	☐	Tax Fairness	"Call Congressman Hulshof. Tell him next time, put working families first" *"Call Congressman Hulshof [local telephone]"*	7/1/97-7/3/97	1998	1998	☐	☐
"Wrong"	WA-03	Bill Clinton, Newt Gingrich, Linda Smith	☐	Tax Fairness	"Call Congressman Smith. Tell him next time, put working families first" *"Call Congressman Smith [local telephone]"*	7/1/97-7/3/97	1998	1998	☐	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"Bad Vote"	WI-01	Mark Neumann, Newt Gingrich, & Bill Clinton	☑	Tax Fairness	"Call Congressman Neumann at (local #) and tell him to fix the plan and support tax cuts that will focus on us. Tell Congressman Neumann, next time, put working families first"	7/1/97-7/3/97	1998	1998	☐	☐
"Bad Vote"	CA-19	Gary Condit, Newt Gingrich, & Bill Clinton	☑	Tax Fairness	"Call Congressman Condit at (local #) and tell him to fix the plan and support tax cuts that will focus on us. Tell Congressman Condit, next time, put working families first"	7/1/97-7/3/97	1998	1998	☐	☐
"Bad Vote"	IL-11 IL-03	Jerry Weller, William Lipinski, Newt Gingrich, & Bill Clinton	☑	Tax Fairness	"Call Congressmen Weller and Lipinski at (local #) and tell him to fix the plan and support tax cuts that will focus on us. Tell Congressmen Weller and Lipinski, next time, put working families first"	7/1/97-7/3/97	1998	1998	☐	☐
"Bad Vote"	CT-05 CT-04	Gary Franks, Chris Shays, Newt Gingrich, & Bill Clinton	☑	Tax Fairness	"Call Congressmen Franks and Shays at (local #) and tell him to fix the plan and support tax cuts that will focus on us. Tell Congressmen Franks and Shays, next time, put working families first"	7/1/97-7/3/97	1998	1998	☐	☐
"Bad Vote"	NY-19 NY-02	Sue Kelly, Rick Lazio, Newt Gingrich, Bill Clinton	☑	Tax Fairness	"Call Congressmen Kelly and Lazio at (local #) and tell him to fix the plan and support tax cuts that will focus on us. Tell Congressmen Kelly and Lazio, next time, put working families first"	7/1/97-7/3/97	1998	1998	☐	☐
"Bad Vote"	OH-19	Steve Latourette, Newt Gingrich, Bill Clinton	☑	Tax Fairness	"Call Congressman Latourette at (local #) and tell him to fix the plan and support tax cuts that will focus on us. Tell Congressman Latourette, next time, put working families first"	7/1/97-7/3/97	1998	1998	☐	☐
"Wrong"	VA-05	Virgil Goode, Bill Clinton, & Newt Gingrich	☐	Tax Fairness	"Call Congressman Goode. Tell him next time, put working families first," via: "Call Congressman Goode" *"Call Congressman Goode [local telephone]"*	7/1/97-7/3/97	1998	1998	☐	☐
"Bad Vote"	WA-01	Rick White, Newt Gingrich, & Bill Clinton	☑	Tax Fairness	"Call Congressman White at (local #) and tell him to fix the plan and support tax cuts that will focus on us. Tell Congressman White, next time, put working families first"	7/1/97-7/3/97	1998	1998	☐	☐
"Wrong"	KY-03	Bill Clinton, Newt Gingrich, Anne Northup	☐	Tax Fairness	"Call Congressman Northup. Tell her next time, put working families first" *"Call Congressman Northup [local telephone]"*	7/1/97-7/3/97	1998	1998	☐	☐

548

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate: Named in normal type; Pictured in italic type	Radio?	Issue(s) Discussed	Call to Action: Audio in normal type; Video in italic type	Dates: Broadcast	Primary	General Election	Broadcast within...: 30 Days of Primary?	Broadcast within...: 60 Days of General Election?
"Rush"	VA-05	Virgil Goode	☐	Fast Track	"Tell Congressman Goode to vote no on Fast Track so he can fight to trade deals that work for us." *"Call Congressman Goode [800-number]"*	9/16/97-9/22/97; 9/23/97-9/24/97	1998	1998	☐	☐
"Rush"	Generic		☐	Fast Track	"Tell your Congressman to vote no on Fast Track so he can fight for trade deals that work for us." *"Call your Congressman [800-number]"*	9/16/97-9/22/97; 10/26/97-10/30/97	1998	1998	☐	☐
"Rush"	MN-08	Bill Luther	☐	Fast Track	"Tell Congressman Luther to vote no on Fast Track so he can fight to trade deals that work for us." *"Call Congressman Luther [800-number]"*	9/16/97-9/22/97; 9/23/97-9/24/97	1998	1998	☐	☐
"Rush"	OH-14	Thomas Sawyer	☐	Fast Track	"Tell Congressman Sawyer to vote no on Fast Track so he can fight f trade deals that work for us." *"Call Congressman Sawyer [800-number]"*	9/16/97-9/22/97; 9/23/97-9/24/97	1998	1998	☐	☐
"Get It Right"	FL-20	Peter Deutsch	☑	Fast Track	"Call Congressman Deutsch at [800-number] and tell him to stop fast track. Tell Congressman Deutsch to fight for trade deals that work fo us."	9/16/97-9/22/97; 9/23/97-9/24/97	1998	1998	☐	☐
"Get It Right"	NJ-12	Michael Pappas	☑	Fast Track	"Call Congressman Pappas at [800-number] and tell him to stop fast track. Tell Congressman Pappas to fight for trade deals that work for us."	9/16/97-9/22/97; 9/23/97-9/24/97; 10/22/97-10/24/97; 10/26/97-10/30/97	1998	1998	☐	☐
"Rush"	PA-21	Phil English	☐	Fast Track	"Tell Congressman English to vote no on Fast Track so he can fight for trade deals that work for us." *"Call Congressman English [800-number]"*	9/16/97-9/22/97; 9/23/97-9/24/97	1998	1998	☐	☐
"Get It Right"	NY-02	Rick Lazio	☑	Fast Track	"Call Congressman Lazio at [800-number] and tell him to stop fast track. Tell Congressman Lazio to fight for trade deals that work for u	9/16/97-9/22/97; 9/23/97-9/24/97	1998	1998	☐	☐
"Get It Right"	NY-18	Nita Lowey	☑	Fast Track	"Call Congresswoman Lowey at [800-number] and tell him to stop fas track. Tell Congresswoman Lowey to fight for trade deals that work f us."	9/16/97-9/22/97; 9/23/97-9/24/97	1998	1998	☐	☐

547

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate: Named in normal type; Pictured in italic type	Radio?	Issue(s) Discussed	Call to Action: Audio in normal type; Video in italic type	Dates: Broadcast	Primary	General Election	Broadcast within...: 30 Days of Primary?	Broadcast within...: 60 Days of General Election?
"Wrong"	MS-05	Bill Clinton, Newt Gingrich, Gene Taylor	☐	Tax Fairness	"Call Congressman Taylor. Tell him next time, put working families first" *"Call Congressman Taylor [local telephone]"*	7/1/97-7/3/97	1998	1998	☐	☐
"Wrong"	VA-02	Bill Clinton, Newt Gingrich, Owen Pickett	☐	Tax Fairness	"Call Congressman Pickett. Tell him next time, put working families first" *"Call Congressman Pickett [local telephone]"*	7/1/97-7/3/97	1998	1998	☐	☐
"Wrong"	LA-07	Bill Clinton, Newt Gingrich, Chris John	☐	Tax Fairness	"Call Congressman John. Tell him next time, put working families firs *"Call Congressman John [local telephone]"*	7/1/97-7/3/97	1998	1998	☐	☐
"Wrong"	TN-06	Bill Clinton, Newt Gingrich, Bob Clement	☐	Tax Fairness	"Call Congressman Clement. Tell him next time, put working families first" *"Call Congressman Clement [local telephone]"*	7/1/97-7/3/97	1998	1998	☐	☐
"Bad Vote"	VA-05	Virgil Goode, Newt Gingrich, & Bill Clinton	☑	Tax Fairness	"Call Congressman Goode at (local #) and tell him to fix the plan and support tax cuts that will focus on us. Tell Congressman Goode, next time, put working families first"	7/1/97-7/3/97	1998	1998	☐	☐
"Rush"	IL-20	John Shimkus	☐	Fast Track	"Tell Congressman Shimkus to vote no on Fast Track so he can fight for trade deals that work for us." *"Call Congressman Shimkus [800-number]"*	9/16/97-9/22/97; 9/23/97-9/24/97; 10/22/97-10/24/97; 10/26/97-10/30/97	1998	1998	☐	☐
"Rush"	FL-05	Karen Thurman	☐	Fast Track	"Tell Congressman Thurman to vote no on Fast Track so he can fight for trade deals that work for us." *"Call Congressman Thurman [800-number]"*	9/16/97-9/22/97; 9/23/97-9/24/97	1998	1998	☐	☐
"Rush"	CT-06	Nancy Johnson	☐	Fast Track	"Tell Congresswoman Johnson to vote no on Fast Track so he can fight for trade deals that work for us." *"Call Congresswoman Johnson [800-number]"*	9/16/97-9/22/97; 9/23/97-9/24/97	1998	1998	☐	☐
"Get It Right"	FL-05	Karen Thurman	☑	Fast Track	"Call Congressman Thurman at [800-number] and tell him to stop fas track. Tell Congressman Thurman to fight for trade deals that work f us."	9/16/97-9/22/97; 9/23/97-9/24/97	1998	1998	☐	☐

550

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate: Named in normal type; Pictured in italic type	Radio?	Issue(s) Discussed	Call to Action: Audio in normal type; Video in italic type	Dates: Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Support"	WI-08	Jay Johnson	☐	Patients' Bill of Rights	"Congressman Johnson supports the Patient Bill of Rights. Call and thank him and him to make sure Congress passes this law for workin families" *"Call Congressman Johnson – [800-number]"*	7/15/98-7/21/98; 7/22/98-7/23/98	9/8/98	11/3/98	☐	☐
"Support"	Maloney CT-06	James Maloney	☐	Patients' Bill of Rights	"Congressman Maloney supports the Patient Bill of Rights. Call and thank him and him to make sure Congress passes this law for workin families" *"Call Congressman Maloney – [800-number]"*	7/15/98-7/21/98; 7/22/98-7/23/98	9/15/98	11/3/98	☐	☐
"Failed"	NM-03	Bill Redmond	☑	Patients' Bill of Rights	"But our Rep., Bill Redmond, has failed to endorse this law, and the insurance industry is spending millions to defeat it. Call Congressma Redmond at [800-number] and tell him to support the Patient Bill of Rights."	7/15/98-7/21/98	9/2/98	11/3/98	☐	☐
"Pass"	NY-01	Michael Forbes	☑	Patients' Bill of Rights	"Fortunately our Rep. Michael Forbes supports the Patient Bill of Rights. Call and thank him at [800-number] and ask him to make sur Congress passes this law for working families"	7/15/98-7/21/98; 7/22/98-7/23/98	9/15/98	11/3/98	☐	☐
"Pass"	OH-19	Steven Latourette	☑	Patients' Bill of Rights	"Fortunately our Rep. Steven Latourette supports the Patient Bill of Rights. Call and thank him at [800-number] and ask him to make sur Congress passes this law for working families"	7/22/98-7/23/98; 7/15/98-7/21/98	9/8/98	11/3/98	☐	☐
"Failed"	NJ-12	Michael Pappas	☑	Patients' Bill of Rights	"But our Rep., Michael Pappas, has failed to endorse this law, and th insurance industry is spending millions to defeat it. Call Congressma Pappas at [800-number] and tell him to support the Patient Bill of Rights."	7/15/98-7/21/98	9/2/98	11/3/98	☐	☐
"Support"	OH-08	Ted Strickland	☐	Patients' Bill of Rights	"Congressman Strickland supports the Patient Bill of Rights. Call and thank him and him to make sure Congress passes this law for workin families" *"Call Congressman Strickland – [800-number]"*	7/15/98-7/21/98; 7/22/98-7/23/98	9/8/98	11/3/98	☐	☐
"Failed"	WA-01	Rick White	☑	Patients' Bill of Rights	"But our Rep., Rick White, has failed to endorse this law, and the insurance industry is spending millions to defeat it. Call Congressma White at [800-number] and tell him to support the Patient Bill of Right	7/15/98-7/21/98	9/15/98	11/3/98	☐	☐

549

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate: Named in normal type; Pictured in italic type	Radio?	Issue(s) Discussed	Call to Action: Audio in normal type; Video in italic type	Dates: Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Get It Right"	PA-13	John Fox	☑	Fast Track	"Call Congressman Fox at [800-number] and tell him to stop fast track. Tell Congressman Fox to fight for trade deals that work for us."	9/18/97-9/24/97; 10/22/97-10/24/97; 10/28/97-10/30/97	1998	1998	☐	☐
"Rush"	CO-02	David Skaggs	☐	Fast Track	"Tell Congressman Skaggs to vote no on Fast Track so he can fight for trade deals that work for us." *"Call Congressman Skaggs [800-number]"*	9/18/97-9/23/97; 9/23/97-9/24/97	1998	1998	☐	☐
"Rush"	NY-29	John LaFalce	☐	Fast Track	"Tell Congressman LaFalce to vote no on Fast Track so he can fight for trade deals that work for us." *"Call Congressman LaFalce [800-number]"*	10/7/97-10/8/97	1998	1998	☐	☐
"Rush"	KY-04	Jim Bunning	☐	Fast Track	"Tell Congressman Bunning to vote no on Fast Track so he can fight for trade deals that work for us." *"Call Congressman Bunning [800-number]"*	10/22/97-10/24/97; 10/28/97-10/30/97	1998	1998	☐	☐
"Rush"	IA-03	Leonard Boswell	☐	Fast Track	"Tell Congressman Boswell to vote no on Fast Track so he can fight for trade deals that work for us." *"Call Congressman Boswell [800-number]"*	10/22/97-10/24/97	1998	1998	☐	☐
"Get It Right"	KY-04	Jim Bunning	☑	Fast Track	"Call Congressman Bunning at [800-number] and tell him to stop fast track. Tell Congressman Bunning to fight for trade deals that work fo us."	10/22/97-10/24/97; 10/28/97-10/30/97	1998	1998	☐	☐
"Support"	HI-01	Neil Abercrombie	☐	Patients' Bill of Rights	"Congressman Neil Abercrombie supports the Patient Bill of Rights. Call and thank him and him to make sure Congress passes this law for working families" *"Call Congressman Abercrombie – [800-number]"*	7/15/98-7/21/98; 7/22/98-7/23/98	9/19/98	11/3/98	☐	☐
"Support"	IL-17	Lane Evans	☐	Patients' Bill of Rights	"Congressman Evans supports the Patient Bill of Rights. Call and thank him and him to make sure Congress passes this law for workin families" *"Call Congressman Evans – [800-number]"*	7/15/98-7/21/98; 7/22/98-7/23/98	3/17/98	11/3/98	☐	☐
"Support"	IA-04	Greg Ganske	☐	Patients' Bill of Rights	"Congressman Ganske supports the Patient Bill of Rights. Call and thank him and him to make sure Congress passes this law for workin families" *"Call Congressman Ganske – [800-number]"*	7/15/98-7/21/98; 7/22/98-7/23/98	6/2/98	11/3/98	☐	☐

552

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type Pictured in italic type	Radio?	Issue(s) Discussed	Call to Action Audio in normal type Video in italic type	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"Call"	IA-Sen	Charles Grassley	☐	Patients' Bill of Rights	"Call Senator Grassley. Tell him to stand up for us and support the Patient Bill of Rights Act." *"Call Senator Grassley – [800-number]"*	7/15/98-7/21/98	6/2/98	11/3/98	☐	☐
"Call"	CT-Sen	Joe Lieberman	☐	Patients' Bill of Rights	"Call Senator Lieberman. Tell him to stand up for us and support the Patient Bill of Rights Act." *"Call Senator Lieberman – [800-number]"*	7/15/98-7/21/98	2000	2000	☐	☐
"Call"	UT-02	Merrill Cook	☐	Patients' Bill of Rights	"Call Congressman Cook. Tell him to stand up for us and support the Patient Bill of Rights Act" *"Call Congressman Cook – [800-number]"*	7/15/98-7/21/98	6/23/98	11/3/98	☐	☐
"Call"	ME-Sen	Olympia Snowe	☐	Patients' Bill of Rights	"Call Senator Snowe. Tell her to stand up for us and support the Patient Bill of Rights Act" *"Call Senator Snowe – [800-number]"*	7/15/98-7/21/98	2000	2000	☐	☐
"Call"	UT-Sen	Bob Bennett	☐	Patients' Bill of Rights	"Call Senator Bennett. Tell him to stand up for us and support the Patient Bill of Rights Act" *"Call Senator Bennett – [800-number]"*	7/15/98-7/21/98	6/23/98	11/3/98	☐	☐
"Call"	OH-01	Steve Chabot	☐	Patients' Bill of Rights	"Call Congressman Chabot. Tell him to stand up for us and support the Patient Bill of Rights Act" *"Call Congressman Chabot – [800-number]"*	7/15/98-7/21/98	[illegible]	11/3/98	☐	☐
"Call"	Generic	*"your representative"*	☐	Patients' Bill of Rights	"Call and tell your representative to stand up for us and support the Patient Bill of Rights Act" *"Call your representative at [800-number]"*	7/15/98-7/21/98		11/3/98	☐	☐
"Basic"	NV-01	John Ensign	☐	Patients' Bill of Rights	"Call Ensign and demand real HMO reform" *"Call Representative Ensign [800-number]"*	7/22/98-7/23/98	9/1/98	11/3/98	☐	☐
"Basic"	IN-08	John Hostettler	☐	Patients' Bill of Rights	"Call Hostettler and demand real HMO reform" *"Call Representative Hostettler [800-number]"*	7/22/98-7/23/98	5/5/98	11/3/98	☐	☐
"Basic"	KY-03	Anne Northup	☐	Patients' Bill of Rights	"Call Northup and demand real HMO reform" *"Call Representative Northup [800-number]"*	7/22/98-7/23/98	5/26/98	11/3/98	☐	☐
"Basic"	IA-02	Jim Nussle	☐	Patients' Bill of Rights	"Call Nussle and demand real HMO reform" *"Call Representative Nussle [800-number]"*	7/22/98-7/23/98	6/2/98	11/3/98	☐	☐

551

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type Pictured in italic type	Radio?	Issue(s) Discussed	Call to Action Audio in normal type Video in italic type	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"Call"	NV-01	John Ensign	☐	Patients' Bill of Rights	"Call Congressman Ensign. Tell him to stand up for us and support the Patient Bill of Rights Act" *"Call Congressman Ensign – [800-number]"*	7/15/98-7/21/98	9/1/98	11/3/98	☐	☐
"Call"	KY-03	Anne Northup	☐	Patients' Bill of Rights	"Call Congresswoman Northup. Tell her to stand up for us and support the Patient Bill of Rights Act." *"Call Congresswoman Northup – [800-number]"*	7/15/98-7/21/98	5/26/98	11/3/98	☐	☐
"Call"	IN-08	John Hostettler	☐	Patients' Bill of Rights	"Call Congressman Hostettler. Tell him to stand up for us and suppo the Patient Bill of Rights Act" *"Call Congressman Hostettler – [800-number]"*	7/15/98-7/21/98	5/5/98	11/3/98	☐	☐
"Call"	MS-05	Gene Taylor	☐	Patients' Bill of Rights	"Call Congressman Taylor. Tell him to stand up for us and support th Patient Bill of Rights Act" *"Call Congressman Taylor – [800-number]"*	7/15/98-7/21/98	6/2/98	11/3/98	☐	☐
"Call"	CA-28	Cal Dooley	☐	Patients' Bill of Rights	"Call Congressman Dooley. Tell him to stand up for us and support the Patient Bill of Rights Act" *"Call Congressman Dooley – [800-number]"*	7/15/98-7/21/98	6/2/98	11/3/98	☐	☐
"Call"	VA-02	Owen Pickett	☐	Patients' Bill of Rights	"Call Congressman Pickett. Tell him to stand up for us and support the Patient Bill of Rights Act" *"Call Congressman Pickett – [800-number]"*	7/15/98-7/21/98	6/9/98	11/3/98	☐	☐
"Call"	IA-02	Jim Nussle	☐	Patients' Bill of Rights	"Call Congressman Nussle. Tell him to stand up for us and support the Patient Bill of Rights Act" *"Call Congressman Nussle – [800-number]"*	7/15/98-7/21/98	6/2/98	11/3/98	☐	☐
"Call"	TN-08	John Tanner	☐	Patients' Bill of Rights	"Call Congressman Tanner. Tell him to stand up for us and support the Patient Bill of Rights Act." *"Call Congressman Tanner – [800-number]"*	7/15/98-7/21/98	8/5/98	11/3/98	☑	☐
"Call"	ID-01	Helen Chenoweth	☐	Patients' Bill of Rights	"Call Congressman Chenoweth. Tell her to stand up for us and support the Patient Bill of Rights Act" *"Call Congresswoman Chenoweth – [800-number]"*	7/15/98-7/21/98	5/26/98	11/3/98	☐	☐
"Call"	MO-Sen	Kit Bond	☐	Patients' Bill of Rights	"Call Senator Bond. Tell him to stand up for us and support the Patient Bill of Rights Act." *"Call Senator Bond – [800-number]"*	7/15/98-7/21/98	8/4/98	11/3/98	☑	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

554

Title	District	Officeholder/Candidate Named in normal type Pictured in italic type	Radio?	Issue(s) Discussed	Call to Action Audio in normal type Video in italic type	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Dairy"	MO-Sen	Kit Bond	☐	Patients' Bill of Rights	"Tell Senator Bond to vote no on S 2330 and demand a real patient protection law." "Call Senator Bond – [800-number]"	8/22/00-8/23/00; 9/10/00-9/21/00	8/4/00	11/3/00	☐	☑
"Dairy"	Generic		☐	Patients' Bill of Rights	"Tell your senator to vote no on S2330 and demand a real patient protection law." "Call you Senator – [800-number]"	9/10/00-9/21/00		11/3/00	☐	☑
"Dairy"	WA-Sen	Slade Gorton	☐	Patients' Bill of Rights	"Tell Senator Gorton to vote no on S 2330 and demand a real patient protection law." "Call Senator Gorton – [800-number]"	9/10/00-9/21/00; 9/22/00-9/23/00	2000	2000	☐	☐
"Dairy"	OH-Sen	Mike DeWine	☐	Patients' Bill of Rights	"Tell Senator DeWine to vote no on S 2330 and demand a real patien protection law." "Call Senator DeWine – [800-number]"	9/10/00-9/21/00; 9/22/00-9/23/00	2000	2000	☐	☐
"Dairy"	ME-Sen	Susan Collins	☐	Patients' Bill of Rights	"Tell Senator Collins to vote no on S 2330 and demand a real patient protection law." "Call Senator Collins – [800-number]"	9/10/00-9/21/00; 9/22/00-9/23/00	2002	2002	☐	☐
"Dairy"	MS-Sen	Olympia Snowe	☐	Patients' Bill of Rights	"Tell Senator Snowe to vote no on S 2330 and demand a real patient protection law." "Call Senator Snowe – [800-number]"	9/10/00-9/21/00; 9/22/00-9/23/00	2000	2000	☐	☐
"Dairy"	IN-Sen	Dan Coats	☐	Patients' Bill of Rights	"Tell Senator Coats to vote no on S 2330 and demand a real patient protection law." "Call Senator Coats – [800-number]"	9/22/00-9/23/00; 9/10/00-9/21/00	N/A	N/A	☐	☐
"Dairy"	KY-Sen	Mitch McConnell	☐	Patients' Bill of Rights	"Tell Senator McConnell to vote no on S 2330 and demand a real patient protection law." "Call Senator McConnell – [800-number]"	9/10/00-9/21/00; 9/22/00-9/23/00; 9/10/00-9/21/00	2002	2002	☐	☐
"Dairy"	IA-Sen	Charles Grassley	☐	Patients' Bill of Rights	"Tell Senator Grassley to vote no on S 2330 and demand a real patie protection law." "Call Senator Grassley – [800-number]"	9/10/00-9/21/00; 9/22/00-9/23/00	6/2/00	11/3/00	☐	☑
"Dairy"	NM-Sen	Pete Domenici	☐	Patients' Bill of Rights	"Tell Senator Domenici to vote no on S 2330 and demand a real patient protection law." "Call Senator Domenici – [800-number]"	9/22/00-9/23/00; 9/10/00-9/21/00	2002	2002	☐	☐

553

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type Pictured in italic type	Radio?	Issue(s) Discussed	Call to Action Audio in normal type Video in italic type	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Soon"	UT-Sen	Bob Bennett	☐	Patients' Bill of Rights	"Call Bennett and demand real HMO reform" "Call Senator Bennett [800-number]"	7/22/00-7/23/00	8/22/00	11/3/00	☐	☐
"Soon"	IA-Sen	Charles Grassley	☐	Patients' Bill of Rights	"Call Grassley and demand real HMO reform" "Call Senator Grassley [800-number]"	7/22/00-7/23/00	6/2/00	11/3/00	☐	☐
"Basic"	ID-01	Helen Chenoweth	☐	Patients' Bill of Rights	"Call Chenoweth and demand real HMO reform" "Call Representative Chenoweth [800-number]"	7/22/00-7/23/00	5/29/00	11/3/00	☐	☐
"Basic"	UT-02	Merrill Cook	☐	Patients' Bill of Rights	"Call Cook and demand real HMO reform" "Call Representative Cook [800-number]"	7/22/00-7/23/00	6/22/00	11/3/00	☐	☐
"Liable"	NJ-12	Michael Pappas	☑	Patients' Bill of Rights	"But our Rep., Michael Pappas, still has not endorsed it. Call Rep. Pappas at [800-number] and demand real HMO reform."	7/22/00-7/23/00	6/2/00	11/3/00	☐	☐
"Soon"	MO-Sen	Kit Bond	☐	Patients' Bill of Rights	"Call Bond and demand real HMO reform" "Call Senator Bond [800-number]"	7/22/00-7/23/00	8/4/00	11/3/00	☑	☐
"Liable"	NM-03	Bill Redmond	☑	Patients' Bill of Rights	"But our Rep., Bill Redmond, still has not endorsed it. Call Rep. Redmond at [800-number] and demand real HMO reform."	7/22/00-7/23/00	6/2/00	11/3/00	☐	☐
"Basic"	OH-01	Steve Chabot	☐	Patients' Bill of Rights	"Call Chabot and demand real HMO reform" "Call Representative Chabot [800-number]"	7/22/00-7/23/00	5/5/00	11/3/00	☐	☐
"Liable"	WA-01	Rick White	☑	Patients' Bill of Rights	"But our Rep., Rick White, still has not endorsed it. Call Rep. White a [800-number] and demand real HMO reform."	7/22/00-7/23/00	9/15/00	11/3/00	☐	☐
"Dairy"	PA-Sen	Rick Santorum	☐	Patients' Bill of Rights	"Tell Senator Santorum to vote no on S 2330 and demand a real patient protection law." "Call Senator Santorum – [800-number]"	9/10/00-9/21/00; 9/22/00-9/23/00	2000	2000	☐	☐
"Dairy"	AR-01	Dale Bumpers	☐	Patients' Bill of Rights	"Tell Senator Bumpers to vote no on S 2330 and demand a real patie protection law." "Call Senator Bumpers – [800-number]"	9/10/00-9/21/00	N/A	N/A	☐	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate: Named in normal type / *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action: Audio in normal type / *Video in italic type*	Dates: Broadcast	Primary	General Election	Broadcast within...: 30 Days of Primary?	Broadcast within...: 60 Days of General Election?
"Dorty"	GA-Sen	Paul Coverdell	☑	Patients' Bill of Rights	"Call Sen. Paul Coverdell at [800-number] Tell Sen. Coverdell to vot no on S2330 and demand a real patient protection law."	9/23/98-9/24/98; 9/10/98-9/21/98	7/21/98	11/3/98	☐	☑
"Dorty"	AZ-Sen	John Kyl	☑	Patients' Bill of Rights	"Call Sen. John Kyl at [800-number] Tell Sen. Kyl to vote no on S333 and demand a real patient protection law."	9/10/98-9/21/98; 9/23/98-9/23/98	2000	2000	☐	☐
"Dorty"	PA-Sen	Rick Santorum	☑	Patients' Bill of Rights	"Call Sen. Rick Santorum at [800-number] Tell Sen. Santorum to vot no on S2330 and demand a real patient protection law."	9/10/98-9/21/98	2000	2000	☐	☐
"Dorty"	OH-Sen	Mike Dewine	☑	Patients' Bill of Rights	"Call Sen. Mike Dewine at [800-number] Tell Sen. Dewine to vote no on S2330 and demand a real patient protection law."	9/10/98-9/21/98	2000	2000	☐	☐
"Dorty"	RI-Sen	John Chafee	☑	Patients' Bill of Rights	"Call Sen. John Chafee at [800-number] Tell Sen. Chafee to vote no on S2330 and demand a real patient protection law."	9/10/98-9/21/98	2000	2000	☐	☐
"Dorty"	NC-Sen	Lauch Faircloth	☐	Patients' Bill of Rights	"Tell Senator Faircloth to vote no on S 2330 and demand a real patie protection law." *"Call Senator Faircloth -- [800-number]"*	9/16/98-9/23/98	5/5/98	11/3/98	☐	☑
"Speermint"	WA-01	Rick White *Newt Gingrich*	☐	Social Security; Tax Fairness	"Call Congressman White and tell him to vote no on this tax scheme. Tell White to put social security first" *"Call Congressman White -- [800-number]"*	9/23/98-9/24/98; 9/24/98-9/25/98	9/15/98	11/3/98	☐	☑
"Speermint"	IA-01	Jim Leach *Newt Gingrich*	☐	Social Security; Tax Fairness	"Call Congressman Leach and tell him to vote no on this tax scheme. Tell Leach to put social security first" *"Call Congressman Leach -- [800-number]"*	9/23/98-9/24/98; 9/24/98-9/25/98	6/2/98	11/3/98	☐	☑
"Speermint"	IA-02	Jim Nussle *Newt Gingrich*	☐	Social Security; Tax Fairness	"Call Congressman Nussle and tell him to vote no on this tax scheme Tell Nussle to put social security first" *"Call Congressman Nussle -- [800-number]"*	9/23/98-9/24/98; 9/24/98-9/25/98	6/2/98	11/3/98	☐	☑
"Speermint"	KY-03	Anne Northup *Newt Gingrich*	☐	Social Security; Tax Fairness	"Call Congressman Northup and tell her to vote no on this tax scheme Tell Northup to put social security first" *"Call Congresswoman Northup -- [800-number]"*	9/23/98-9/24/98; 9/24/98-9/25/98	5/25/98	11/3/98	☐	☑

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate: Named in normal type / *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action: Audio in normal type / *Video in italic type*	Dates: Broadcast	Primary	General Election	Broadcast within...: 30 Days of Primary?	Broadcast within...: 60 Days of General Election?
"Speermint"	KY-04	Jim Bunning *Newt Gingrich*	☐	Social Security; Tax Fairness	"Call Congressman Bunning and tell him to vote no on this tax scheme. Tell Bunning to put social security first" *"Call Congressman Bunning -- [800-number]"*	9/23/98-9/24/98; 9/24/98-9/25/98	5/26/98	11/3/98	☐	☑
"Speermint"	MS-04	Mike Parker *Newt Gingrich*	☐	Social Security; Tax Fairness	"Call Congressman Parker and tell him to vote no on this tax scheme. Tell Parker to put social security first" *"Call Congressman Parker -- [800-number]"*	9/23/98-9/24/98; 9/24/98-9/25/98	6/2/98	11/3/98	☐	☑
"Speermint"	VA-05	Virgil Goode *Newt Gingrich*	☐	Social Security; Tax Fairness	"Call Congressman Goode and tell him to vote no on this tax scheme Tell Goode to put social security first" *"Call Congressman Goode -- [800-number]"*	9/23/98-9/24/98; 9/24/98-9/25/98	6/9/98	11/3/98	☐	☑
"Speermint"	WI-02	Scott Klug *Newt Gingrich*	☐	Social Security; Tax Fairness	"Call Congressman Klug and tell him to vote no on this tax scheme. Tell Klug to put social security first" *"Call Congressman Klug -- [800-number]"*	9/23/98-9/24/98; 9/24/98-9/25/98	9/8/98	11/3/98	☐	☑
"Speermint"	OH-01	Steve Chabot *Newt Gingrich*	☐	Social Security; Tax Fairness	"Call Congressman Chabot and tell him to vote no on this tax scheme Tell Chabot to put social security first" *"Call Congressman Chabot -- [800-number]"*	9/23/98-9/24/98; 9/24/98-9/25/98	5/5/98	11/3/98	☐	☑
"Barker"	OH-01	Steve Chabot & Newt Gingric	☑	Fast Track	"Call Rep. Bhvdt? at (local #) and tell him to vote no on fast track. T him we're still paying attention and fast track is still a bad Mea"	9/22/98-9/25/98	5/5/98	11/3/98	☐	☑
"Barker"	MO-7	Roy Blunt & Newt Gingrich	☑	Fast Track	"Call Rep. Blunt at (local #) and tell him to vote no on fast track. Tell him we're still paying attention and fast track is still a bad Mm"	9/21/98-9/25/98	8/4/98	11/3/98	☐	☑
"Speer"	AL-04	Robert Aderholt & Newt Gingrich	☑	Social Security; Tax Fairness	"Call Congressman Robert Aderholt at [800-number], and tell Aderhol to vote no on this election-year tax scheme. Call [800-number] and t Aderholt to put social security first"	9/23/98-9/24/98; 9/24/98-9/25/98	6/2/98	11/3/98	☐	☑
"Speer"	ID-02	Mike Crapo & Newt Gingrich	☑	Social Security; Tax Fairness	"Call Congressman Mike Crapo at [800-number], and tell Crapo to vo no on this election-year tax scheme. Call [800-number] and tell Crap to put social security first".	9/23/98-9/24/98; 9/24/98-9/25/98	5/26/98	11/3/98	☐	☑
"Speer"	ID-01	Helen Chenoweth & Newt Gingrich	☑	Social Security; Tax Fairness	"Call Congresswoman Helen Chenoweth at [800-number], and tell Chenoweth to vote no on this election-year tax scheme. Call [800-number] and tell Chenoweth to put social security first"	9/23/98-9/24/98; 9/24/98-9/25/98	5/26/98	11/3/98	☐	☑

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Dave"	WA-01	Rick White & Newt Gingrich *Newt Gingrich*	☐	Social Security; Tax Fairness	"Call White and tell him to vote no when the Gingrich plan comes up again. Tell him this time, put social security first" "Call Representative White – [800-number]"	10/2/98-10/5/98; 10/7/98-10/8/98	9/15/98	11/3/98	☐	☑
"Dave"	ID-02	Michael Crapo & Newt Gingrich *Newt Gingrich*	☐	Social Security; Tax Fairness	"Call Crapo and tell him to vote no when the Gingrich plan comes up again. Tell him this time, put social security first" "Call Representative Crapo – [800-number]"	10/2/98-10/5/98; 10/7/98-10/8/98	8/26/98	11/3/98	☐	☑
"Dave"	Generic	Newt Gingrich *Newt Gingrich*	☐	Social Security; Tax Fairness	"Call your Representatives and tell them to vote no when the Gingrich plan comes up again. Tell them, this time, put social security first" "Call your representative – [800-number]"	10/2/98-10/8/98		11/3/98	☐	☑
"Dave"	IA-01	Jim Leach & Newt Gingrich *Newt Gingrich*	☐	Social Security; Tax Fairness	"Call Leach and tell him to vote no when the Gingrich plan comes up again. Tell him this time, put social security first" "Call Representative Leach – [800-number]"	10/2/98-10/5/98; 10/7/98-10/8/98	6/2/98	11/3/98	☐	☑
"Dave"	IA-02	Jim Nussle & Newt Gingrich *Newt Gingrich*	☐	Social Security; Tax Fairness	"Call Nussle and tell him to vote no when the Gingrich plan comes up again. Tell him this time, put social security first" "Call Representative Nussle – [800-number]"	10/2/98-10/5/98; 10/7/98-10/8/98	6/2/98	11/3/98	☐	☑
"Dave"	KY-03	Anne Northup & Newt Gingric *Newt Gingrich*	☐	Social Security; Tax Fairness	"Call Northup and tell her to vote no when the Gingrich plan comes u again. Tell her this time, put social security first" "Call Representative Northup – [800-number]"	10/2/98-10/8/98	5/26/98	11/3/98	☐	☑
"Dave"	MS-04	Mike Parker & Newt Gingrich *Newt Gingrich*	☐	Social Security; Tax Fairness	"Call Parker and tell him to vote no when the Gingrich plan comes up again. Tell him this time, put social security first" "Call Representative Parker – [800-number]"	10/2/98-10/5/98; 10/7/98-10/8/98	6/2/98	11/3/98	☐	☑
"Dave"	OH-01	Steve Chabot & Newt Gingric *Newt Gingrich*	☐	Social Security; Tax Fairness	"Call Chabot and tell him to vote no when the Gingrich plan comes u again. Tell him this time, put social security first" "Call Representative Chabot – [800-number]"	10/2/98-10/5/98; 10/7/98-10/8/98	5/5/98	11/3/98	☐	☑
"Dave"	VA-06	Virgil Goode & Newt Gingrich *Newt Gingrich*	☐	Social Security; Tax Fairness	"Call Goode and tell him to vote no when the Gingrich plan comes up again. Tell him this time, put social security first" "Call Representative Goode – [800-number]"	10/2/98-10/8/98	6/9/98	11/3/98	☐	☑
"Dave"	KY-04	Jim Bunning & Newt Gingrich *Newt Gingrich*	☐	Social Security; Tax Fairness	"Call Bunning and tell him to vote no when the Gingrich plan comes u again. Tell him this time, put social security first" "Call Representative Bunning – [800-number]"	10/2/98-10/5/98; 10/7/98-10/8/98	5/26/98	11/3/98	☐	☑

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Spew"	NV-01	John Ensign & Newt Gingrich	☑	Social Security; Tax Fairness	"Call Congressman John Ensign at [800-number], and tell Ensign to vote no on this election-year tax scheme. Call [800-number] and tell Ensign to put social security first"	9/23/98-9/24/98; 9/24/98-9/25/98	9/1/98	11/3/98	☐	☑
"Spew"	WI-01	Mark Neumann & Newt Gingrich	☑	Social Security; Tax Fairness	"Call Congressman Mark Neumann at [800-number], and tell Neumann to vote no on this election-year tax scheme. Call [800-number] and tell Neumann to put social security first"	9/23/98-9/24/98	9/8/98	11/3/98	☐	☑
"Barker"	LA-07	Chris John & Newt Gingrich	☑	Fast Track	"Call Rep. John at (local #) and tell him to vote no on fast track. Tell him we're still paying attention and fast track is still a bad idea"	9/21/98-9/25/98	10/3/98	11/3/98	☑	☑
"Barker"	WI-02	Scott Klug & Newt Gingrich	☑	Fast Track	"Call Rep. Klug at (local #) and tell him to vote no on fast track. Te him we're still paying attention and fast track is still a bad idea"	9/22/98-9/25/98	9/8/98	11/3/98	☐	☑
"Barker"	MO-08	Jo Ann Emerson & Newt Gingrich	☑	Fast Track	"Call Rep. Emerson at (local #) and tell him to vote no on fast track. Tell him we're still paying attention and fast track is still a bad idea"	9/21/98-9/25/98	8/2/98	11/3/98	☐	☑
"Barker"	KY-03	Anne Northup & Newt Gingric	☑	Fast Track	"Call Rep. Northup at (local #) and tell her to vote no on fast track. T her we're still paying attention and fast track is still a bad idea"	9/22/98-9/25/98	5/26/98	11/3/98	☑	☑
"Barker"	GA-01	Jack Kingston & Newt Gingrich	☑	Fast Track	"Call Rep. Kingston at (local #) and tell him to vote no on fast track. Tell him we're still paying attention and fast track is still a bad idea"	9/21/98-9/25/98	7/21/98	11/3/98	☐	☑
"Barker"	WA-01	Rick White & Newt Gingrich	☑	Fast Track	"Call Rep. White at (local #) and tell him to vote no on fast track. Tell him we're still paying attention and fast track is still a bad idea"	9/22/98-9/25/98	9/15/98	11/3/98	☐	☑
"Stock"	NV-01	John Ensign & Newt Gingrich	☑	Social Security	"Call Rep. Ensign at [888-number]." "Tell Ensign to vote no when the Gingrich plan comes up again. Tell him this time, put social security first"	10/2/98-10/5/98; 10/7/98-10/8/98	2000	2000	☐	☑
"Dave"	WI-02	Scott Klug & Newt Gingrich *Newt Gingrich*	☐	Social Security; Tax Fairness	"Call Klug and tell him to vote no when the Gingrich plan comes up again. Tell him this time, put social security first" "Call Representative Klug – [800-number]"	10/2/98-10/5/98; 10/7/98-10/8/98	9/8/98	11/3/98	☐	☑

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Voice"	KY-06	Ernie Fletcher	☐	Budget Priorities; Medicare Funding; Tax Fairness	"Call Fletcher. Tell him next time put working families first" "Call Congressman Fletcher – [800-number]"	9/15/99-9/21/99	2000	2000	☐	☐
"Voice"	CA-49	Brian Bilbray	☐	Budget Priorities; Medicare Funding; Tax Fairness	"Call Bilbray. Tell him next time put working families first" "Call Congressman Bilbray – [800-number]"	9/15/99-9/21/99	3/7/00	2000	☐	☐
"Voice"	AR-04	Jay Dickey	☐	Budget Priorities; Medicare Funding; Tax Fairness	"Call Dickey. Tell him next time put working families first" "Call Congressman Dickey – [800-number]"	9/15/99-9/21/99	2000	2000	☐	☐
"Voice"	NM-02	Joe Skeen	☐	Budget Priorities; Medicare Funding; Tax Fairness	"Call Skeen. Tell him next time put working families first" "Call Congressman Skeen – [800-number]"	9/15/99-9/21/99	2000	2000	☐	☐
"Voice"	PA-10	Don Sherwood	☐	Budget Priorities; Medicare Funding; Tax Fairness	"Call Sherwood. Tell him next time put working families first" "Call Congressman Sherwood – [800-number]"	9/15/99-9/21/99	2000	2000	☐	☐
"Voice"	WA-08	George Nethercutt	☐	Budget Priorities; Medicare Funding; Tax Fairness	"Call Nethercut. Tell him next time put working families first" "Call Congressman Nethercut – [800-number]"	9/15/99-9/21/99	2000	2000	☐	☐
"Voice"	WI-01	Paul Ryan	☐	Budget Priorities; Medicare Funding; Tax Fairness	"Call Ryan. Tell him next time put working families first" "Call Congressman Ryan – [800-number]"	9/15/99-9/21/99	2000	2000	☐	☐
"Voice"	MI-Sen	Spence Abraham	☐	Budget Priorities; Medicare Funding; Tax Fairness	"Call Abraham. Tell him next time put working families first" "Call Senator Abraham – [800-number]"	9/15/99-9/21/99	2000	2000	☐	☐

560

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Side"	WA-Sen	Slade Gorton	☐	Patients' Bill of Rights	"Call Senator Gorton. Ask him which side he's on" "Which side is Senator Gorton on? [800-number]"	7/12/99-7/15/99	2000	2000	☐	☐
"Side"	MN-Sen	Rod Grams	☐	Patients' Bill of Rights	"Call Senator Grams. Ask him which side he's on" "Which side is Senator Grams on? [800-number]"	7/12/99-7/15/99	2000	2000	☐	☐
"Change" Fitzgerald	IL-Sen	Peter Fitzgerald	☑	Patients' Bill of Rights	"Call Senator Fitzgerald at [800-number] and ask him which side he's on"	7/12/99-7/15/99	2004	2004	☐	☐
"Change" Roth	DE-Sen	Bill Roth	☑	Patients' Bill of Rights	"Call Senator Roth at [800-number] and ask him which side he's on"	7/12/99-7/15/99	9/9/00	11/7/00	☐	☐
"Side"	MO-Sen	John Ashcroft	☐	Patients' Bill of Rights	"Call Senator Ashcroft. Ask him which side he's on" "Which side is Senator Ashcroft on? [800-number]"	7/12/99-7/15/99	2000	2000	☐	☐
"Side"	ME-Sen	Olympia Snowe	☐	Patients' Bill of Rights	"Call Senator Snowe. Ask her which side he's on" "Which side is Senator Snowe on? [800-number]"	7/12/99-7/15/99	2000	2000	☐	☐
"Side"	PA-Sen	Rick Santorum	☐	Patients' Bill of Rights	"Call Senator Santorum. Ask him which side he's on" "Which side is Senator Santorum on? [800-number]"	7/12/99-7/15/99	4/4/00	2000	☐	☐
"Side"	VT-Sen	Jim Jeffords	☐	Patients' Bill of Rights	"Call Senator Jeffords. Ask him which side he's on" "Which side is Senator Jeffords on? [800-number]"	7/12/99-7/15/99	2000	2000	☐	☐
"Side"	MI-Sen	Spence Abraham	☐	Patients' Bill of Rights	"Call Senator Abraham. Ask him which side he's on" "Which side is Senator Abraham on? [800-number]"	7/12/99-7/15/99	2000	2000	☐	☐
"Side"	ME-Sen	Susan Collins	☐	Patients' Bill of Rights	"Call Senator Collins. Ask her which side she's on" "Which side is Senator Collins on? [800-number]"	7/12/99-7/15/99	2002	2002	☐	☐
"Voice"	KS-04	Todd Tiahrt	☐	Budget Priorities; Medicare Funding; Tax Fairness	"Call Tiahrt. Tell him next time put working families first" "Call Congressman Tiahrt – [800-number]"	9/15/99-9/21/99	2000	2000	☐	☐
"Voice"	KY-01	Edward Whitfield	☐	Budget Priorities; Medicare Funding; Tax Fairness	"Call Whitfield. Tell him next time put working families first" "Call Congressman Whitfield – [800-number]"	9/15/99-9/21/99	2000	2000	☐	☐

559

562

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"Decide"	MO-08	Jo Ann Emerson *Not available*	☐	Patients' Bill of Rights	Not available	10/4/99-10/7/99	2000	2000	☐	☐
"Decide"	NC-08	Robert Hayes *Not available*	☐	Patients' Bill of Rights	Not available	10/4/99-10/7/99	2000	2000	☐	☐
"Decide"	FL-08	Bill McCollum *Not available*	☐	Patients' Bill of Rights	Not available	10/4/99-10/7/99	2000	2000	☐	☐
"Watch"	CA-27	James Rogan *Not available*	☑	Patients' Bill of Rights	Not available	10/4/99-10/7/99	2000	2000	☐	☐
"Watch"	CA-27	*Not available*	☑	Patients' Bill of Rights	Not available	10/4/99-10/7/99	2000	2000	☐	☐
"Watch"	CA-23	*Not available*	☑	Patients' Bill of Rights	Not available	10/4/99-10/7/99	2000	2000	☐	☐
"Decide"	AR-04	Jay Dickey *Not available*	☐	Patients' Bill of Rights	Not available	10/4/99-10/7/99	2000	2000	☐	☐
"Decide"	LA-01	Bob Livingston *Not available*	☐	Patients' Bill of Rights	Not available	10/4/99-10/7/99	2000	2000	☐	☐
"Watch"	CA-49	*Not available*	☑	Patients' Bill of Rights	Not available	10/4/99-10/7/99	2000	2000	☐	☐
"Decide"	KY-01	Ed Whitfield *Not available*	☐	Patients' Bill of Rights	Not available	10/4/99-10/7/99	2000	2000	☐	☐
"Decide"	WA-05	George Nethercutt *Not available*	☐	Patients' Bill of Rights	Not available	10/4/99-10/7/99	2000	2000	☐	☐
"Decide"	TN-03	Zach Wamp *Not available*	☐	Patients' Bill of Rights	Not available	10/4/99-10/7/99	2000	2000	☐	☐
"Decide"	LA-08	Richard Baker *Not available*	☐	Patients' Bill of Rights	Not available	10/4/99-10/7/99	2000	2000	☐	☐

561

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"Voice"	MO-Sen	John Ashcroft	☐	Budget Priorities; Medicare Funding; Tax Fairness	"Call Ashcroft. Tell him next time put working families first" "Call Senator Ashcroft – [800-number]"	9/15/99-9/21/99	2000	2000	☐	☐
"Voice"	PA-Sen	Rick Santorum	☐	Budget Priorities; Medicare Funding; Tax Fairness	"Call Santorum. Tell him next time put working families first" "Call Senator Santorum – [800-number]"	9/15/99-9/21/99	4/4/00	2000	☐	☐
"Voice"	WA-Sen	Slade Gorton	☐	Budget Priorities; Medicare Funding; Tax Fairness	"Call Gorton. Tell him next time put working families first" "Call Senator Gorton – [800-number]"	9/15/99-9/21/99	2000	2000	☐	☐
"Voice"	LA-08	Richard Baker	☐	Budget Priorities; Medicare Funding; Tax Fairness	"Call Baker. Tell him next time put working families first" "Call Congressman Baker – [800-number]"	9/15/99-9/21/99	2000	2000	☐	☐
"Secure"	PA-Sen	Rick Santorum	☑	Medicare Prescription Drug Benefit; Tax Fairness	"Call Senator Santorum at [800-number]. Tell him that securing medicare and helping seniors pay for their prescription drugs is more important another tax cut for the wealthy. Next time, Senator, put working families first"	9/15/99-9/21/99	2000	2000	☐	☐
"Secure"	CA-03	Doug Ose	☑	Medicare Prescription Drug Benefit; Tax Fairness	"Call Congressman Ose at [800-number]. Tell him that securing medicare and helping seniors pay for their prescription drugs is more important another tax cut for the wealthy. Next time, Congressman, put working families first"	9/15/99-9/21/99	2000	2000	☐	☐
"Secure"	CA-48	Brian Bilbray	☑	Medicare Prescription Drug Benefit; Tax Fairness	"Call Congressman Bilbray at [800-number]. Tell him that securing medicare and helping seniors pay for their prescription drugs is more important another tax cut for the wealthy. Next time, Congressman, put working families first"	9/15/99-9/21/99	2000	2000	☐	☐
"Secure"	GA-07	Bob Barr	☑	Medicare Prescription Drug Benefit; Tax Fairness	"Call Congressman Barr at [800-number]. Tell him that securing medicare and helping seniors pay for their prescription drugs is more important another tax cut for the wealthy. Next time, Congressman, put working families first"	9/15/99-9/21/99	2000	2000	☐	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Label"	MI-8en	Spence Abraham	☐	Permanent Trade Status for China	"Tell Senator Abraham to vote no and keep China on probation until this label stands for fairness." *"Call Senator Abraham – [local telephone]"*	2/23/00-3/28/00	8/8/00	11/7/00	☐	☐
"Label"	WI-03	Ron Kind	☐	Permanent Trade Status for China	"Tell Congressman Kind to vote no and keep China on probation until this label stands for fairness." *"Call Congressman Kind – [local telephone]"*	2/23/00-3/28/00	9/12/00	11/7/00	☐	☐
"Label"	FL-15	Dave Weldon	☐	Permanent Trade Status for China	"Tell Congressman Weldon to vote no and keep China on probation until this label stands for fairness." *"Call Congressman Weldon – [local telephone]"*	2/23/00-3/28/00	9/5/00	11/7/00	☐	☐
"Label"	MO-8en	John Ashcroft	☐	Permanent Trade Status for China	"Tell Senator Ashcroft to vote no and keep China on probation until th label stands for fairness." *"Call Senator Ashcroft – [local telephone]"*	2/23/00-3/28/00	8/8/00	11/7/00	☐	☐
"Label"	MA-8en	John Kerry	☐	Permanent Trade Status for China	"Tell Senator Kerry to vote no and keep China on probation until this label stands for fairness." *"Call Senator Kerry – [local telephone]"*	2/23/00-3/28/00	2002	2002	☐	☐
"Label"	PA-11	Paul Kanjorski	☐	Permanent Trade Status for China	"Tell Congressman Kanjorski to vote no and keep China on probation until this label stands for fairness." *"Call Congressman Kanjorski – [local telephone]"*	2/23/00-3/28/00	4/4/00	11/7/00	☐	☐
"Label"	CO-01	Diana DeGette	☐	Permanent Trade Status for China	"Tell Congresswoman DeGette to vote no and keep China on probati until this label stands for fairness." *"Call Congresswoman DeGette – [local telephone]"*	2/23/00-3/28/00	8/8/00	11/7/00	☐	☐
"Label"	KY-01	Edward Whitfield	☐	Permanent Trade Status for China	"Tell Congressman Whitfield to vote no and keep China on probation until this label stands for fairness." *"Call Congressman Whitfield – [local telephone]"*	2/23/00-3/28/00	5/23/00	11/7/00	☐	☐
"Label"	FL-02	Allen Boyd	☐	Permanent Trade Status for China	"Tell Congressman Boyd to vote no and keep China on probation until this label stands for fairness." *"Call Congressman Boyd – [local telephone]"*	2/23/00-3/28/00	9/5/00	11/7/00	☐	☐
"Trust"	Generic		☐	Permanent Trade Status for China	"Tell your member of Congress to keep China on probation until Chin earns our trust" *"Call your member of Congress – [800-number]"*	4/4/00-4/13/00		11/7/00	☐	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Decide"	KY-03	Anne Northup *Not available*	☐	Patients' Bill of Rights	Not available	10/4/99-10/7/99	2000	2000	☐	☐
"Decide"	WI-08	Thomas Petri *Not available*	☐	Patients' Bill of Rights	Not available	10/4/99-10/7/99	2000	2000	☐	☐
"Decide"	PA-10	Don Sherwood *Not available*	☐	Patients' Bill of Rights	Not available	10/4/99-10/7/99	2000	2000	☐	☐
"March"			☐		"As the world trade meetings open, join the march for global justice, and raise your voice for those who can't." *"AFL-CIO March for Global Justice."*	11/29/99-12/3/99		2000	☐	☐
"Justice"			☐		"As the world trade meetings open, join the fight for global justice, an raise your voice for those who can't" *"AFL-CIO Fight for Global Justice www. AFLCIO.org/WTO"*	11/29/99-12/3/99		2000	☐	☐
"Justice/CHN"			☐		"As the world trade meetings open, join the fight for global justice, an raise your voice for those who can't" *"AFL-CIO Fight for Global Justice www. AFLCIO.org/WTO"*	11/29/99-12/3/99		2000	☐	☐
"Label"	TX-16	Silvestre Reyes	☐	Permanent Trade Status for China	"Tell Congressman Reyes to vote no and keep China on probation un this label stands for fairness." *"Call Congressman Reyes – [local telephone]"*	2/23/00-3/28/00	3/14/00	11/7/00	☑	☐
"Label"	TX-14	Ron Paul	☐	Permanent Trade Status for China	"Tell Congressman Paul to vote no and keep China on probation until this label stands for fairness." *"Call Congressman Paul – [local telephone]"*	2/23/00-3/28/00	3/14/00	11/7/00	☑	☐
"Label"	MI-07	Nick Smith	☐	Permanent Trade Status for China	"Tell Congressman Smith to vote no and keep China on probation un this label stands for fairness." *"Call Congressman Smith – [local telephone]"*	2/23/00-3/28/00	8/8/00	11/7/00	☐	☐
"Label"	NC-08	Sue Myrick	☐	Permanent Trade Status for China	"Tell Congresswoman Myrick to vote no and keep China on probation until this label stands for fairness." *"Call Congresswoman Myrick – [local telephone]"*	2/23/00-3/28/00	5/2/00	11/7/00	☐	☐
"Label"	MO-7	Roy Blunt	☐	Permanent Trade Status for China	"Tell Congressman Blunt to vote no and keep China on probation unt this label stands for fairness." *"Call Congressman Blunt – [local telephone]"*	2/23/00-3/28/00	8/8/00	11/7/00	☐	☐

566

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

		Officeholder/Candidate			Call to Action	Dates			Broadcast within...	
Title	*District*	Named in normal type *Pictured in italic type*	*Radio?*	*Issue(s) Discussed*	Audio in normal type *Video in italic type*	*Broadcast*	*Primary*	*General Election*	*30 Days of Primary?*	*60 Days of General Election?*
"Endure"	MA-05	Martin Meehan	☐	Permanent Trade Status for China	"Tell Congressman Meehan to keep China on probation until China earns our trust." *"Call Congressman Meehan – [800-number]"*	4/24/00-4/30/00	9/19/00	11/7/00	☐	☐
"Endure"	VA-Sen	George Allen	☐	Permanent Trade Status for China	"Tell Congressman Allen to keep China on probation until China earn our trust." *"Call Congressman Allen – [800-number]"*	4/25/00-4/30/00	9/13/00	11/7/00	☐	☐
"Endure"	KY-01	Edward Whitfield	☐	Permanent Trade Status for China	"Tell Congressman Whitfield to keep China on probation until China earns our trust." *"Call Congressman Whitfield – [800-number]"*	4/24/00-4/30/00	8/22/00	11/7/00	☑	☐
"Endure"	NM-02	Joe Skeen	☐	Permanent Trade Status for China	"Tell Congressman Skeen to keep China on probation until China earns our trust." *"Call Congressman Skeen – [800-number]"*	4/24/00-4/30/00	6/6/00	11/7/00	☐	☐
"Endure"	IN-02	Steve Buyer	☐	Permanent Trade Status for China	"Tell Congressman Buyer to keep China on probation until China ear our trust." *"Call Congressman Buyer – [800-number]"*	4/25/00-4/30/00	5/2/00	11/7/00	☑	☐
"Trust"	FL-05	Karen Thurman	☐	Permanent Trade Status for China	"Tell Congressman Thurman to keep China on probation until China earns our trust" *"Call Congressman Thurman – [800-number]"*	4/24/00-4/30/00	9/5/00	11/7/00	☐	☐
"Endure"	FL-05	Karen Thurman	☐	Permanent Trade Status for China	"Tell Congressman Thurman to keep China on probation until Chin earns our trust." *"Call Congressman Thurman – [800-number]"*	4/24/00-4/30/00	9/5/00	11/7/00	☐	☐
"Trust"	VA-Sen	George Allen	☐	Permanent Trade Status for China	"Tell Congressman Allen to keep China on probation until China earn our trust" *"Call Congressman Allen – [800-number]"*	4/25/00-4/30/00	9/13/00	11/7/00	☐	☐
"Endure"	MA-07	Ed Markey	☐	Permanent Trade Status for China	"Tell Congressman Markey to keep China on probation until China earns our trust." *"Call Congressman Markey – [800-number]"*	4/24/00-4/30/00	9/19/00	11/7/00	☐	☐
"Trust"	MA-07	Ed Markey	☐	Permanent Trade Status for China	"Tell Congressman Markey to keep China on probation until China earns our trust" *"Call Congressman Markey – [800-number]"*	4/24/00-4/30/00	9/19/00	11/7/00	☐	☐

565

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

		Officeholder/Candidate			Call to Action	Dates			Broadcast within...	
Title	*District*	Named in normal type *Pictured in italic type*	*Radio?*	*Issue(s) Discussed*	Audio in normal type *Video in italic type*	*Broadcast*	*Primary*	*General Election*	*30 Days of Primary?*	*60 Days of General Election?*
"Endure"	Generic		☐	Permanent Trade Status for China	"Tell your member of Congress to keep China on probation until Chin earns our trust." *"Call you member of Congress – [800-number]"*	4/4/00-4/13/00		11/7/00	☐	☐
"Endure"	MN-01	Gil Gutknecht	☐	Permanent Trade Status for China	"Tell Congressman Gutknecht to keep China on probation until China earns our trust." *"Call Congressman Gutknecht – [800-number]"*	4/25/00-4/30/00	9/12/00	11/7/00	☐	☐
"Trust"	NM-02	Joe Skeen	☐	Permanent Trade Status for China	"Tell Congressman Skeen to keep China on probation until China earns our trust" *"Call Congressman Skeen – [800-number]"*	4/24/00-4/30/00	6/6/00	11/7/00	☐	☐
"Trust"	TX-14	Ron Paul	☐	Permanent Trade Status for China	"Tell Congressman Paul to keep China on probation until China earn our trust" *"Call Congressman Paul – [800-number]"*	4/24/00-4/30/00	3/14/00	11/7/00	☐	☐
"Endure"	TX-14	Ron Paul	☐	Permanent Trade Status for China	"Tell Congressman Paul to keep China on probation until China earn our trust." *"Call Congressman Paul – [800-number]"*	4/24/00-4/30/00	3/14/00	11/7/00	☐	☐
"Trust"	MN-07	John Peterson	☐	Permanent Trade Status for China	"Tell Congressman Peterson to keep China on probation until China earns our trust" *"Call Congressman Peterson – [800-number]"*	4/24/00-4/30/00	4/4/00	11/7/00	☐	☐
"Endure"	MN-07	John Peterson	☐	Permanent Trade Status for China	"Tell Congressman Peterson to keep China on probation until China earns our trust." *"Call Congressman Peterson – [800-number]"*	4/24/00-4/30/00	4/4/00	11/7/00	☐	☐
"Trust"	NY-03	Anthony Weiner	☐	Permanent Trade Status for China	"Tell Congressman Weiner to keep China on probation until China earns our trust" *"Call Congressman Weiner – [800-number]"*	4/24/00-4/30/00	9/12/00	11/7/00	☐	☐
"Endure"	NY-03	Anthony Weiner	☐	Permanent Trade Status for China	"Tell Congressman Weiner to keep China on probation until China earns our trust." *"Call Congressman Weiner – [800-number]"*	4/24/00-4/30/00	9/12/00	11/7/00	☐	☐
"Trust"	IN-05	Steve Buyer	☐	Permanent Trade Status for China	"Tell Congressman Buyer to keep China on probation until China ear our trust" *"Call Congressman Buyer – [800-number]"*	4/25/00-4/30/00	5/2/00	11/7/00	☑	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type Pictured in italic type	Radio?	Issue(s) Discussed	Call to Action Audio in normal type Video in italic type	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"Trust"	OH-16	Ralph Regula	☐	Permanent Trade Status for China	"Tell Congressman Regula to keep China on probation until China earns our trust." *"Call Congressman Regula – [800-number]"*	5/11/00-5/17/00	3/7/00	11/7/00	☐	☐
"Endure"	OH-16	Ralph Regula	☐	Permanent Trade Status for China	"Tell Congressman Regula to keep China on probation until China earns our trust." *"Call Congressman Regula – [800-number]"*	5/11/00-5/17/00	3/7/00	11/7/00	☐	☐
"Stand"	OH-16	Bob Hoy	☑	Permanent Trade Status for China	"Call Congressman Hoy, and thank him for standing up for Ohio's working families. He knows "made in China" should mean fairness to Ohio's workers, and more"	5/11/00-5/17/00	3/7/00	11/7/00	☐	☐
"Stand"	MI-08	Debbie Stabenow	☑	Permanent Trade Status for China	"Call Rep. Stabenow and thank her. Tell her to keep fighting for Michigan's working families."	5/2/00-5/8/00	8/8/00	11/7/00	☐	☐
"Sky"	NC-08	Robert Hayes	☐	Medicare Prescription Drug Benefit	"Call and make sure Hayes is putting working families ahead of special interests" *"Call Congressman Hayes – [local #]"*	9/1/00-9/7/00	5/2/00	11/7/00	☐	☐
"Sky"	AR-04	Jay Dickey	☐	Medicare Prescription Drug Benefit	"Call and make sure Dickey is putting working families ahead of special interests" *"Call Congressman Dickey – [local #]"*	9/1/00-9/7/00	5/23/00	11/7/00	☐	☐
"Sky"	CA-27	James Rogan	☐	Medicare Prescription Drug Benefit	"Call and make sure Rogan is putting working families ahead of special interests" *"Call Congressman Rogan – [local #]"*	7/18/00-7/24/00; 8/28/00-8/6/00	3/7/00	11/7/00	☐	☐
"Sky"	CA-38	Steven Kuykendall	☐	Medicare Prescription Drug Benefit	"Call Kuykendall, tell him to quit putting special interests ahead of working families" *"Call Congressman Kuykendall – [local #]"*	7/18/00-7/24/00; 8/28/00-8/6/00	3/7/00	11/7/00	☐	☐
"Sky"	NH-02	Charles Bass	☐	Medicare Prescription Drug Benefit	"Call and make sure Bass is putting working families ahead of special interests" *"Call Congressman Bass – [local telephone]"*	7/18/00-7/24/00; 8/28/00-8/6/00	9/12/00	11/7/00	☐	☐
"Sky"	KY-02	Anne Northup	☐	Medicare Prescription Drug Benefit	"Call and make sure Northup is putting working families ahead of special interests" *"Call Congresswoman Northup [local #]"*	9/1/00-9/7/00	5/23/00	11/7/00	☐	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type Pictured in italic type	Radio?	Issue(s) Discussed	Call to Action Audio in normal type Video in italic type	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"Endure"	NY-29	John LaFalce	☐	Permanent Trade Status for China	"Tell Congressman LaFalce to keep China on probation until China earns our trust." *"Call Congressman LaFalce – [800-number]"*	4/29/00-4/30/00	9/12/00	11/7/00	☐	☐
"Trust"	KY-01	Edward Whitfield	☐	Permanent Trade Status for China	"Tell Congressman Whitfield to keep China on probation until China earns our trust" *"Call Congressman Whitfield – [800-number]"*	4/24/00-4/30/00	5/23/00	11/7/00	☑	☐
"Trust"	NY-29	John LaFalce	☐	Permanent Trade Status for China	"Tell Congressman LaFalce to keep China on probation until China earns our trust" *"Call Congressman LaFalce – [800-number]"*	4/25/00-4/30/00	9/12/00	11/7/00	☐	☐
"Trust"	MN-01	Gil Gutknecht	☐	Permanent Trade Status for China	"Tell Congressman Gutknecht to keep China on probation until China earns our trust" *"Call Congressman Gutknecht – [800-number]"*	4/25/00-4/30/00	9/12/00	11/7/00	☐	☐
"Endure"	NC-01	Eva Clayton	☐	Permanent Trade Status for China	"Tell Congresswoman Clayton to keep China on probation until China earns our trust." *"Call Congresswoman Clayton – [800-number]"*	4/25/00-4/30/00	5/2/00	11/7/00	☑	☐
"Trust"	NC-01	Eva Clayton	☐	Permanent Trade Status for China	"Tell Congresswoman Clayton to keep China on probation until China earns our trust" *"Call Congresswoman Clayton – [800-number]"*	4/25/00-4/30/00	5/2/00	11/7/00	☑	☐
"Endure"	CA-20	Cal Dooley	☐	Permanent Trade Status for China	"Tell Congressman Dooley to keep China on probation until China earns our trust." *"Call Congressman Dooley – [800-number]"*	4/25/00-4/30/00	3/7/00	11/7/00	☐	☐
"Trust"	WI-04	Gerald Kleczka	☐	Permanent Trade Status for China	"Tell Congressman Kleczka to keep China on probation until China earns our trust" *"Call Congressman Kleczka – [800-number]"*	4/25/00-4/30/00	9/12/00	11/7/00	☐	☐
"Endure"	WI-04	Gerald Kleczka	☐	Permanent Trade Status for China	"Tell Congressman Kleczka to keep China on probation until China earns our trust." *"Call Congressman Kleczka – [800-number]"*	4/25/00-4/30/00	9/12/00	11/7/00	☐	☐
"Trust"	MA-05	Martin Meehan	☐	Permanent Trade Status for China	"Tell Congressman Meehan to keep China on probation until China earns our trust" *"Call Congressman Meehan – [800-number]"*	4/24/00-4/30/00	9/19/00	11/7/00	☐	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days Be
"Protect"	FL-22	Clay Shaw	☐	Medicare Prescription Drug Benefit	"Tell Shaw: quit putting special interests ahead of working families" "Call Congressman Shaw – *[local telephone]*"	7/26/00-7/31/00; 8/8/00-8/14/00; 8/30/00-9/5/00	8/8/00	11/7/00	☑	
"Protect"	NM-01	Heather Wilson	☐	Medicare Prescription Drug Benefit	"Tell Wilson: quit putting special interests ahead of working families" "Call Congresswoman Wilson – *[local telephone]*"	8/10/00-8/16/00; 8/30/00-9/5/00; 7/27/00-8/2/00	9/5/00	11/7/00	☐	
"Protect"	AR-04	Jay Dickey	☐	Medicare Prescription Drug Benefit	"Tell Dickey: quit putting special interests ahead of working families" "Call Congressman Dickey – *[local telephone]*"	7/26/00-7/31/00; 8/1/00-8/7/00; 8/9/00-8/14/00	5/23/00	11/7/00	☐	
"Protect"	WA-05	George Nethercutt	☐	Medicare Prescription Drug Benefit	"Tell Nethercutt: quit putting special interests ahead of working families" "Call Congressman Nethercutt – *[local telephone]*"	8/10/00-8/16/00; 8/30/00-9/5/00; 7/27/00-8/2/00	9/19/00	11/7/00	☐	
"Protect"	KY-03	Anne Northup	☐	Medicare Prescription Drug Benefit	"Tell Northup: quit putting special interests ahead of working families" "Call Congresswoman Northup – *[local telephone]*"	7/26/00-7/31/00; 8/9/00-8/14/00; 8/30/00-9/5/00	5/23/00	11/7/00	☐	
"Protect"	NC-08	Robert Hayes	☐	Medicare Prescription Drug Benefit	"Tell Hayes: quit putting special interests ahead of working families" "Call Congressman Hayes – *[local telephone]*"	7/26/00-7/31/00; 8/9/00-8/14/00; 8/30/00-9/5/00	5/9/00	11/7/00	☐	
"Protect"	CA-48	Brian Bilbray	☐	Medicare Prescription Drug Benefit	"Tell Bilbray: quit putting special interests ahead of working families" "Call Congressman Bilbray – *[local telephone]*"	8/10/00-8/16/00; 8/30/00-9/5/00; 7/27/00-8/2/00	3/7/00	11/7/00	☐	
"Protect"	CA-27	James Rogan	☐	Medicare Prescription Drug Benefit	"Tell Rogan: quit putting special interests ahead of working families" "Call Congressman Rogan – *[local telephone]*"	8/2/00-8/8/00	3/7/00	11/7/00	☐	
"Protect"	MI-Sen	Spence Abraham	☐	Medicare Prescription Drug Benefit	"Tell Abraham: quit putting special interests ahead of working families" "Call Congressman Abraham – *[local telephone]*"	8/7/00-8/13/00; 8/14/00-8/20/00	8/8/00	11/7/00	☑	
"Protect"	MN-Sen	Rod Grams	☐	Medicare Prescription Drug Benefit	"Tell Grams: quit putting special interests ahead of working families" "Call Senator Grams – *[local telephone]*"	8/7/00-8/13/00; 8/14/00-8/20/00	8/12/00	11/7/00	☑	

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days Be
"Shy"	KY-06	Ernie Fletcher	☐	Medicare Prescription Drug Benefit	"Call and make sure Fletcher is putting working families ahead of special interests" "Call Congressman *Fletcher – [local telephone]*"	7/18/00-7/24/00; 8/2/00-8/8/00	5/23/00	11/7/00	☐	
"Shy"	CA-48	Brian Bilbray	☐	Medicare Prescription Drug Benefit	"Call and make sure Bilbray is putting working families ahead of special interests" "Call Congressman *Bilbray – [local tel*"	8/10/00-8/16/00; 8/30/00-9/5/00	3/7/00	11/7/00	☐	
"Shy"	FL-22	Clay Shaw	☐	Medicare Prescription Drug Benefit	"Call and make sure Shaw is putting working families ahead of specia interests" "Call Congressman *Shaw – [local telephone]*"	8/1/00-8/7/00	9/5/00	11/7/00	☑	
"Shy"	NM-01	Heather Wilson	☐	Medicare Prescription Drug Benefit	"Call and make sure Wilson is putting working families ahead of special interests" "Call Congresswoman Wilson - *local tel*"	8/10/00-8/16/00; 8/30/00-9/5/00	8/8/00	11/7/00	☐	
"Shy"	PA-10	Don Sherwood	☐	Medicare Prescription Drug Benefit	"Call and make sure Sherwood is putting working families ahead of special interests" "Call Congressman *Sherwood – [local telephone]*"	7/18/00-7/24/00; 8/2/00-8/8/00	4/4/00	11/7/00	☐	
"Shy"	WA-05	George Nethercutt	☐	Medicare Prescription Drug Benefit	"Call and make sure Nethercutt is putting working families ahead of special interests" "Call Congressman *Nethercutt – [local tel*"	8/10/00-8/16/00; 8/30/00-9/5/00	9/19/00	11/7/00	☐	
"Protect"	NH-02	Charles Bass	☐	Medicare Prescription Drug Benefit	"Tell Bass: quit putting special interests ahead of working families" "Call Congressman *Bass – [local telephone]*"	7/26/00-8/1/00; 8/2/00-8/8/00	9/12/00	11/7/00	☐	
"Protect"	PA-10	Don Sherwood	☐	Medicare Prescription Drug Benefit	"Tell Sherwood: quit putting special interests ahead of working families" "Call Congressman *Sherwood – [local telephone]*"	7/26/00-8/1/00; 8/2/00-8/8/00	4/4/00	11/7/00	☐	
"Protect"	CA-36	Steven Kuykendall	☐	Medicare Prescription Drug Benefit	"Tell Kuykendall: quit putting special interests ahead of working families" "Call Congressman *Kuykendall – [local telephone]*"	7/26/00-8/1/00; 8/2/00-8/8/00	3/7/00	11/7/00	☐	
"Protect"	KY-06	Ernie Fletcher	☐	Medicare Prescription Drug Benefit	"Tell Fletcher: quit putting special interests ahead of working families" "Call Congressman *Fletcher – [local telephone]*"	7/26/00-8/1/00; 8/2/00-8/8/00	5/23/00	11/7/00	☐	

Index of AFL-CIO Issue Advertising, 1995-2001

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of Gen. Election?
"Help"	PA-10	Don Sherwood	☐	Patients' Bill of Rights	"Call Sherwood and tell him he's on the wrong side." *"Call Congressman Sherwood"*	10/9/00-10/15/00	4/4/00	11/7/00	☐	☐
"Teacher"		George W. Bush *George W. Bush*	☐	Social Security; Tax Fairness	*"Tell Bush: hands off social security" (no phone number)*	9/12/00-9/24/00		11/7/00	☐	☐
"Job"	PA-16	Pat Toomey	☐	Health & Safety (Ergonomics)	"Tell Toomey his politics causes pain." *"Call Congressman Toomey – [local telephone]"*	9/13/00-9/26/00	4/4/00	11/7/00	☐	☐
"Job"	NH-02	Charles Bass	☐	Health & Safety (Ergonomics)	"Tell Bass his politics causes pain." *"Call Congressman Bass – [local telephone]"*	9/13/00-9/25/00	9/12/00	11/7/00	☐	☐
"Job"	CA-36	Steven Kuykendall	☐	Health & Safety (Ergonomics)	"Tell Kuykendall his politics causes pain." *"Call Congressman Kuykendall – [local telephone]"*	9/13/00-9/25/00	3/7/00	11/7/00	☐	☐
"Job"	NM-01	Heather Wilson	☐	Health & Safety (Ergonomics)	"Tell Wilson her politics causes pain." *"Call Congresswoman Wilson – [local telephone]"*	9/25/00-10/1/00	6/6/00	11/7/00	☐	☑
"Job"	FL-22	Clay Shaw	☐	Health & Safety (Ergonomics)	"Tell Shaw his politics causes pain." *"Call Congressman Shaw – [local telephone]"*	9/13/00-9/25/00	9/5/00	11/7/00	☐	☑
"Job"	AR-04	Jay Dickey	☐	Health & Safety (Ergonomics)	"Tell Dickey his politics causes pain." *"Call Congressman Dickey – [local telephone]"*	9/16/00-9/25/00	5/23/00	11/7/00	☐	☑
"Job"	KY-06	Ernie Fletcher	☐	Health & Safety (Ergonomics)	"Tell Fletcher his politics causes pain." *"Call Congressman Fletcher – [local telephone]"*	9/13/00-9/25/00	5/23/00	11/7/00	☐	☑
"Job"	KY-03	Anne Northup	☐	Health & Safety (Ergonomics)	"Tell Northup her politics causes pain." *"Call Congresswoman Northup – [local telephone]"*	9/16/00-9/25/00	5/23/00	11/7/00	☐	☑

Index of AFL-CIO Issue Advertising, 1995-2001

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of Gen. Election?
"Help"	NH-02	Charles Bass	☐	Patients' Bill of Rights	"Call Bass and tell him he's on the wrong side." *"Call Congressman Bass – [local telephone]"*	8/28/00-9/5/00; 9/18/00-9/24/00	9/12/00	11/7/00	☑	☐
"Help"	CA-27	James Rogan	☐	Patients' Bill of Rights	"Call Rogan and tell him he's on the wrong side." *"Call Congressman Rogan – [local telephone]"*	8/18/00-9/24/00; 9/28/00-9/9/00	3/7/00	11/7/00	☐	☐
"Help"	KY-06	Ernie Fletcher	☐	Patients' Bill of Rights	"Call Fletcher and tell him he's on the wrong side." *"Call Congressman Fletcher – [local telephone]"*	9/18/00-9/24/00; 10/9/00-10/16/00; 9/28/00-9/9/00	5/23/00	11/7/00	☐	☑
"Help"	IN-08	John Hostettler	☐	Patients' Bill of Rights	"Call Hostettler and tell him he's on the wrong side." *"Call Congressman Hostettler – [local telephone]"*	9/28/00-10/1/00; 9/28/00-9/9/00; 9/18/00-9/24/00	5/2/00	11/7/00	☐	☑
"Help"	CA-36	Steve Kuykendall	☐	Patients' Bill of Rights	"Call Steve Kuykendall and tell him he's on the wrong side." *"Call Congressman Kuykendall"*	9/18/00-9/24/00; 9/28/00-9/9/00	3/7/00	11/7/00	☐	☐
"Help"	WA-05	George Nethercutt	☐	Patients' Bill of Rights	"Call Nethercutt and tell him he's on the wrong side." *"Call Congressman Nethercutt – [local telephone]"*	9/28/00-9/9/00; 9/7/00-9/15/00	9/19/00	11/7/00	☑	☑
"Help"	NC-08	Robert Hayes	☐	Patients' Bill of Rights	"Call Hayes and tell him he's on the wrong side." *"Call Congressman Hayes – [local telephone]"*	9/7/00-9/15/00; 9/28/00-9/9/00	5/2/00	11/7/00	☐	☑
"Help"	KY-03	Anne Northup	☐	Patients' Bill of Rights	"Call Northup and tell her she's on the wrong side." *"Call Congresswoman Northup – [local telephone]"*	10/9/00-10/16/00; 9/28/00-9/9/00; 9/7/00-9/15/00	5/23/00	11/7/00	☐	☑
"Help"	AR-04	Jay Dickey	☐	Patients' Bill of Rights	"Call Dickey and tell him he's on the wrong side." *"Call Congressman Dickey – [local telephone]"*	10/9/00-10/16/00; 9/7/00-9/15/00; 9/28/00-9/9/00	5/23/00	11/7/00	☑	☑
"Help"	FL-22	Clay Shaw	☐	Patients' Bill of Rights	"Call Shaw and tell him he's on the wrong side." *"Call Congressman Shaw"*	10/9/00-10/16/00	9/5/00	11/7/00	☐	☑

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Who" Traverse City-REV	MI-Sen	Spence Abraham	☐	Minimum Wage; Overtime Protections; Health & Safety	"Tell Abraham when he votes against our wages, our safety, he's not working for Michigan's working families"	10/16/00-10/22/00	8/8/00	11/7/00	☐	☑
		Spence Abraham			*"Call Senator Abraham [local #]"*					
"Bury"		George W. Bush	☐	Social Security						
		George W. Bush				10/26/00-11/7/00; 10/31/00-11/7/00		11/7/00	☐	☑
"Debate"		George W. Bush	☑	Patients' Bill of Rights	(none)					
						10/29/00-11/7/00		11/7/00	☐	☑
"Work"	OE-Sen	Bill Roth	☑	Patients' Bill of Rights	"Call Sen. Roth. Tell him to stop covering for the insurance industry. Ask him why he's working against working families."	11/1/00-11/7/00	8/8/00	11/7/00	☐	☑
"Track"	CT-02	Robert Simmons & "the President"	☐	Fast Track	"Tell Congressman Simmons to vote no on fast track so he can fight for trade deals that work for us."	7/25/01-7/25/01	2002	2002	☐	☐
					"Call Congressman Simmons – [local telephone]"					
"Track"	PA-07	Curt Weldon & "the President"	☐	Fast Track	"Tell Congressman Weldon to vote no on fast track so he can fight to trade deals that work for us."	7/25/01-7/25/01	2002	2002	☐	☐
					"Call Congressman Weldon – [local telephone]"					
"Track"	AL-05	Bud Cramer & "the President"	☐	Fast Track	"Tell Congressman Cramer to vote no on fast track so he can fight to trade deals that work for us."	7/25/01-7/25/01	2002	2002	☐	☐
					"Call Congressman Cramer – [local telephone]"					
"Track"	AR-02	Victor Snyder & "the President"	☐	Fast Track	"Tell Congressman Snyder to vote no on fast track so he can fight for trade deals that work for us."	7/25/01-7/25/01	2002	2002	☐	☐
					"Call Congressman Snyder – [local telephone]"					
"Track"	PA-10	Don Sherwood & "the President"	☐	Fast Track	"Tell Congressman Sherwood to vote no on fast track so he can fight for trade deals that work for us."	7/25/01-7/25/01	2002	2002	☐	☐
					"Call Congressman Sherwood [local telephone]"					
"Track"	NJ-03	Jim Saxton & "the President"	☐	Fast Track	"Tell Congressman Saxton to vote no on fast track so he can fight for trade deals that work for us."	7/25/01-7/25/01	2002	2002	☐	☐
					"Call Congressman Saxton – [local telephone]"					

Page 103 of 108

574

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Job"	KY-01	Edward Whitfield	☐	Health & Safety (Ergonomics)	"Tell Whitfield his politics causes pain."	9/13/00-9/25/00	5/23/00	11/7/00	☐	☑
					"Call Congressman Whitfield – [local telephone]"					
"Job"	WA-08	George Nethercutt	☐	Health & Safety (Ergonomics)	"Tell Nethercutt his politics causes pain."	9/13/00-9/25/00	9/19/00	11/7/00	☑	☑
					"Call Congressman Nethercutt – [local telephone]"					
"Job"	CA-49	Brian Bilbray	☐	Health & Safety (Ergonomics)	"Tell Bilbray his politics causes pain."	9/13/00-9/25/00	3/7/00	11/7/00	☐	☑
					"Call Congressman Bilbray – [local telephone]"					
"Job"	PA-10	Don Sherwood	☐	Health & Safety (Ergonomics)	"Tell Sherwood his politics causes pain."	9/13/00-9/25/00	4/4/00	11/7/00	☐	☑
					"Call Congressman Sherwood – [local telephone]"					
"Job"	HC-08	Robert Heyns	☐	Health & Safety (Ergonomics)	"Tell Heyns his politics causes pain."	9/18/00-9/25/00	5/2/00	11/7/00	☐	☑
					"Call Congressman Heyns – [local telephone]"					
"Job"	CA-27	James Rogan	☐	Health & Safety (Ergonomics)	"Tell Rogan his politics causes pain."	9/13/00-9/25/00	3/7/00	11/7/00	☐	☑
					"Call Congressman Rogan – [local telephone]"					
"Help"	PA-19	Pat Toomey	☐	Patients' Bill of Right	"Call Toomey and tell him he's on the wrong side."	9/6/00-9/11/00	4/4/00	11/7/00	☐	☑
					"Call Congressman Toomey – [local telephone]"					
"Who" Detroit-REV	MI-Sen	Spence Abraham	☐	Minimum Wage; Overtime Protections; Health & Safety	"Tell Abraham when he votes against our wages, our safety, he's not working for Michigan's working families"	10/16/00-10/22/00	8/8/00	11/7/00	☐	☑
		Spence Abraham			*"Call Senator Abraham [local #]"*					
"Who" Lansing-REV	MI-Sen	Spence Abraham	☐	Minimum Wage; Overtime Protections; Health & Safety	"Tell Abraham when he votes against our wages, our safety, he's not working for Michigan's working families"	10/16/00-10/22/00	8/8/00	11/7/00	☐	☑
		Spence Abraham			*"Call Senator Abraham [local #]"*					
"Who" Grand Rapids-REV	MI-Sen	Spence Abraham	☐	Minimum Wage; Overtime Protections; Health & Safety	"Tell Abraham when he votes against our wages, our safety, he's not working for Michigan's working families"	10/16/00-10/22/00	8/8/00	11/7/00	☐	☑
		Spence Abraham			*"Call Senator Abraham [local #]"*					

Page 102 of 108

573

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"Track"	KY-04	Lucas & "the President"	☐	Fast Track	"Tell Congressman Lucas to vote no on fast track so he can fight for trade deals that work for us." *"Call Congressman Lucas – [local telephone]"*	7/25/01-7/29/01	2002	2002	☐	☐
"Track"	TX-02	Jim Turner & "the President"	☐	Fast Track	"Tell Congressman Turner to vote no on fast track so he can fight for trade deals that work for us." *"Call Congressman Turner – [local telephone]"*	7/25/01-7/29/01	2002	2002	☐	☐
"Track"	CA-49	Susan Davis & "the President"	☐	Fast Track	"Tell Congresswoman Davis to vote no on fast track so she can fight for trade deals that work for us." *"Call Congresswoman Davis – [local telephone]"*	7/25/01-7/29/01	2002	2002	☐	☐
"Now"	PA-10	Don Sherwood	☐	Fast Track	"Tell Congressman Sherwood to vote no on fast track," man-on-street "Tell them to sit down and take another look at this." *"Call Congressman Sherwood – [local telephone]"*	10/21/01-10/25/01; 11/4/01-11/7/01	2002	2002	☐	☐
"Now"	OH-16	Ralph Regula	☐	Fast Track	"Tell Congressman Regula to vote no on fast track," man-on-street "Tell them to sit down and take another look at this." *"Call Congressman Regula – [local telephone]"*	10/21/01-10/25/01; 11/4/01-11/7/01	2002	2002	☐	☐
"Now"	NC-04	David Price	☐	Fast Track	"Tell Congressman Price to vote no on fast track," man-on-street "Tell them to sit down and take another look at this." *"Call Congressman Price – [local telephone]"*	10/21/01-10/25/01; 11/4/01-11/7/01	2002	2002	☐	☐
"Now"	IN-02	Mike Pence	☐	Fast Track	"Tell Congressman Pence to vote no on fast track," man-on-street "Tell them to sit down and take another look at this." *"Call Congressman Pence – [local telephone]"*	10/21/01-10/25/01	2002	2002	☐	☐
"Now"	GA-10	Charlie Norwood	☐	Fast Track	"Tell Congressman Norwood to vote no on fast track," man-on-street "Tell them to sit down and take another look at this." *"Call Congressman Norwood – [local telephone]"*	10/21/01-10/25/01; 11/4/01-11/7/01	2002	2002	☐	☐
"Now"	KS-03	Dennis Moore	☐	Fast Track	"Tell Congressman Moore to vote no on fast track," man-on-street "Tell them to sit down and take another look at this." *"Call Congressman Moore – [local telephone]"*	10/21/01-10/25/01; 11/4/01-11/7/01	2002	2002	☐	☐
"Now"	KY-04	Kenneth Lucas	☐	Fast Track	"Tell Congressman Lucas to vote no on fast track," man-on-street "Tell them to sit down and take another look at this." *"Call Congressman Lucas – [local telephone]"*	10/21/01-10/25/01; 11/4/01-11/7/01	2002	2002	☐	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	60 Days of General Election?
"Track"	AL-03	Bob Riley & "the President"	☐	Fast Track	"Tell Congressman Riley to vote no on fast track so he can fight for trade deals that work for us." *"Call Congressman Riley – [local telephone]"*	7/25/01-7/29/01	2002	2002	☐	☐
"Track"	WV-02	Capito & "the President"	☐	Fast Track	"Tell Congressman Capito to vote no on fast track so he can fight for trade deals that work for us." *"Call Congressman Capito – [local telephone]"*	7/25/01-7/29/01	2002	2002	☐	☐
"Track"	AL-04	Robert Aderholt & "the President"	☐	Fast Track	"Tell Congressman Aderholt to vote no on fast track so he can fight f trade deals that work for us." *"Call Congressman Aderholt – [local telephone]"*	7/25/01-7/29/01	2002	2002	☐	☐
"Track"	OH-16	Ralph Regula & "the President"	☐	Fast Track	"Tell Congressman Regula to vote no on fast track so he can fight for trade deals that work for us." *"Call Congressman Regula – [local telephone]"*	7/25/01-7/29/01	2002	2002	☐	☐
"Track"	KS-03	Dennis Moore & "the President"	☐	Fast Track	"Tell Congressman Moore to vote no on fast track so he can fight for trade deals that work for us." *"Call Congressman Moore – [local telephone]"*	7/25/01-7/29/01	2002	2002	☐	☐
"Track"	CA-20	Cal Dooley & "the President"	☐	Fast Track	"Tell Congressman Dooley to vote no on fast track so he can fight for trade deals that work for us." *"Call Congressman Dooley – [local telephone]"*	7/25/01-7/29/01	2002	2002	☐	☐
"Track"	CA-18	Zoe Lofgren & "the President"	☐	Fast Track	"Tell Congresswoman Lofgren to vote no on fast track so she can fig for trade deals that work for us." *"Call Congresswoman Ofgren – [local telephone]"*	7/25/01-7/29/01	2002	2002	☐	☐
"Track"	IN-08	Hill & "the President"	☐	Fast Track	"Tell Congressman Hill to vote no on fast track so he can fight for trad deals that work for us." *"Call Congressman Hill – [local telephone]"*	7/25/01-7/29/01	2002	2002	☐	☐
"Track"	NJ-07	Mike Ferguson & "the President"	☐	Fast Track	"Tell Congressman Ferguson to vote no on fast track so he can fight for trade deals that work for us." *"Call Congressman Ferguson – [local telephone]"*	7/25/01-7/29/01	2002	2002	☐	☐
"Track"	CA-14	Anna Eshoo & "the President"	☐	Fast Track	"Tell Congresswoman Eshoo to vote no on fast track so she can fight for trade deals that work for us." *"Call Congresswoman Eshoo – [local telephone]"*	7/25/01-7/29/01	2002	2002	☐	☐

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 90 Days of General Election?
"How"	AR-02	Victor Snyder	☐	Fast Track	"Tell Congressman Snyder to vote no on fast track;" man-on-street "Tell them to sit down and take another look at this." *"Call Congressman Snyder – [local telephone]"*	10/21/01-10/25/01; 11/A/01-11/7/01	2002	2002	☐	☐
"How"	UT-02	Jim Matheson	☐	Fast Track	"Tell Congressman Matheson to vote no on fast track;" man-on-street "Tell them to sit down and take another look at this." *"Call Congressman Matheson – [local telephone]"*	11/A/01-11/7/01	2002	2002	☐	☐
"How"	FL-11	Jim Davis	☐	Fast Track	"Tell Congressman Davis to vote no on fast track;" man-on-street "Te them to sit down and take another look at this." *"Call Congressman Davis"*	11/A/01-11/7/01	2002	2002	☐	☐
"How"	OR-03	Earl Blumenauer	☐	Fast Track	"Tell Congressman Blumenauer to vote no on fast track;" man-on-street "Tell them to sit down and take another look at this." *"Call Congressman Blumenauer – [local telephone]"*	10/21/01-10/25/01; 11/A/01-11/7/01	2002	2002	☐	☐
"How"	WV-02	Shelley Capito	☐	Fast Track	"Tell Congressman Capito to vote no on fast track;" man-on-street "Tell them to sit down and take another look at this." *"Call Congressman Capito – [local telephone]"*	10/21/01-10/25/01; 11/A/01-11/7/01	2002	2002	☐	☐
"How"	CT-02	Robert Simmons	☐	Fast Track	"Tell Congressman Simmons to vote no on fast track;" man-on-street "Tell them to sit down and take another look at this." *"Call Congressman Simmons – [local telephone]"*	10/21/01-10/25/01; 11/A/01-11/7/01	2002	2002	☐	☐
"How"	WA-09	Adam Smith	☐	Fast Track	"Tell Congressman Smith to vote no on fast track;" man-on-street "Te them to sit down and take another look at this." *"Call Congressman Smith – [local telephone]"*	10/21/01-10/25/01	2002	2002	☐	☐
"Allow"	ME-Sen	Susan Collins	☐	Tax Fairness	"Now it's up to Senator Collins. Tell her we can't lift our economy if w leave working families behind." *"Call Senator Collins – [800-number]"*	11/3/01-11/16/01	2002	2002	☐	☐
"Allow"	OR-Sen	Gordon Smith	☐	Tax Fairness	"Now it's up to Senator Smith. Tell him we can't lift our economy if w leave working families behind." *"Call Senator Smith – [800-number]"*	11/7/01-11/16/01	2002	2002	☐	☐
"Allow"	KS-Sen	Sam Brownback	☐	Tax Fairness	"Now it's up to Senator Brownback. Tell him we can't lift our economy if we leave working families behind." *"Call Senator Brownback – [800-number]"*	11/7/01-11/16/01	2004	2004	☐	☐

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 90 Days of General Election?
"How"	CA-16	Zoe Lofgren	☐	Fast Track	"Tell Congresswoman Lofgren to vote no on fast track;" man-on-street "Tell them to sit down and take another look at this." *"Call Congresswoman Lofgren – [local telephone]"*	10/21/01-10/25/01	2002	2002	☐	☐
"How"	TX-15	Ruben Hinojosa	☐	Fast Track	"Tell Congressman Hinojosa to vote no on fast track;" man-on-street "Tell them to sit down and take another look at this." *"Call Congressman Hinojosa – [local telephone]"*	10/21/01-10/25/01; 11/A/01-11/7/01	2002	2002	☐	☐
"How"	TX-25	Ken Bentsen	☐	Fast Track	"Tell Congressman Bentsen to vote no on fast track;" man-on-street "Tell them to sit down and take another look at this." *"Call Congressman Bentsen – [local telephone]"*	11/A/01-11/7/01	2002	2002	☐	☐
"How"	IN-09	Baron Hill	☐	Fast Track	"Tell Congressman Hill to vote no on fast track;" man-on-street "Tell them to sit down and take another look at this." *"Call Congressman Hill – [local telephone]"*	10/21/01-10/25/01; 11/A/01-11/7/01	2002	2002	☐	☐
"How"	PA-04	Melissa Hart	☐	Fast Track	"Tell Congresswoman Hart to vote no on fast track;" man-on-street "Tell them to sit down and take another look at this." *"Call Congresswoman Hart – [local telephone]"*	10/21/01-10/25/01; 11/A/01-11/7/01	2002	2002	☐	☐
"How"	CA-36	Jane Harman	☐	Fast Track	"Tell Congresswoman Harman to vote no on fast track;" man-on-stre "Tell them to sit down and take another look at this." *"Call Congresswoman Harman – [local telephone]"*	10/21/01-10/25/01; 11/A/01-11/7/01	2002	2002	☐	☐
"How"	NC-02	David Funderburk & Bob Etheridge	☐	Fast Track	"Tell Congressman Etheridge to vote no on fast track;" man-on-street "Tell them to sit down and take another look at this." *"Call Congressman Etheridge – [local telephone]"*	10/21/01-10/25/01; 11/A/01-11/7/01	2002	2002	☐	☐
"How"	CA-14	Anna Eshoo	☐	Fast Track	"Tell Congresswoman Eshoo to vote no on fast track;" man-on-street "Tell them to sit down and take another look at this." *"Call Congresswoman Eshoo – [local telephone]"*	10/21/01-10/25/01	2002	2002	☐	☐
"How"	CA-49	Susan Davis	☐	Fast Track	"Tell Congresswoman Davis to vote no on fast track;" man-on-street "Tell them to sit down and take another look at this." *"Call Congresswoman Davis – [local telephone]"*	10/21/01-10/25/01; 11/A/01-11/7/01	2002	2002	☐	☐
"How"	CT-01	John Larson	☐	Fast Track	"Tell Congressman Larson to vote no on fast track;" man-on-street "Tell them to sit down and take another look at this." *"Call Congressman Larson – [local telephone]"*	10/21/01-10/25/01	2002	2002	☐	☐

Index of Advertising Run Under Coalition Names With Other Groups, 1998-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Stand Up"			☑	Get Out The Vote		10/27/98-11/3/98		11/3/98	☐	☑
"My Name is Lisa Wilson"			☑	Get Out The Vote		10/27/98-11/3/98		11/3/98	☐	☑
"News Anchor" West Coast-Spanish		Newt Gingrich	☑	Get Out The Vote		10/27/98-11/3/98		11/3/98	☐	☑
"News Anchor"		Newt Gingrich	☑	Get Out The Vote		10/27/98-11/3/98		11/3/98	☐	☑
"Bernice"			☑	Get Out The Vote		10/27/98-11/3/98		11/3/98	☐	☑
"Block"	MI-Sen	Spence Abraham	☑	Patients' Bill of Rights	"Call Senator Abraham. Tell him to stop covering for the insurance industry and pass a real patient protection law. Tell him we're waiting	6/28/00-7/6/00; 8/2/00-8/8/00	8/8/00	11/7/00	☐	☐
"Block"	MO-Sen	John Ashcroft	☑	Patients' Bill of Rights	"Call Senator Ashcroft. Tell him to stop covering for the insurance industry and pass a real patient protection law. Tell him we're waiting	8/28/00-7/6/00	8/8/00	11/7/00	☐	☐
"Block"	WA-Sen	Slade Gorton	☑	Patients' Bill of Rights	"Call Senator Gorton. Tell him to stop covering for the insurance industry and pass a real patient protection law. Tell him we're waiting	8/28/00-7/6/00	8/15/00	11/7/00	☐	☐
"Block"	MN-Sen	Rod Grams	☑	Patients' Bill of Rights	"Call Senator Grams. Tell him to stop covering for the insurance industry and pass a real patient protection law. Tell him we're waiting	8/28/00-7/6/00	8/12/00	11/7/00	☐	☐
"Block"	PA-Sen	Rick Santorum	☑	Patients' Bill of Rights	"Call Senator Santorum. Tell him to stop covering for the insurance industry and pass a real patient protection law. Tell him we're waiting	8/28/00-7/6/00	4/4/00	11/7/00	☐	☐
"Block"	DE-Sen	Bill Roth	☑	Patients' Bill of Rights	"Call Senator Roth. Tell him to stop covering for the insurance industry and pass a real patient protection law. Tell him we're waiting	8/28/00-7/6/00	8/8/00	11/7/00	☐	☐

580

Index of AFL-CIO Issue Advertising, 1995-2001

Counsel Only

Title	District	Officeholder/Candidate Named in normal type *Pictured in italic type*	Radio?	Issue(s) Discussed	Call to Action Audio in normal type *Video in italic type*	Dates Broadcast	Primary	General Election	Broadcast within... 30 Days of Primary?	Broadcast within... 60 Days of General Election?
"Afford"	ME-Sen	Olympia Snowe	☐	Tax Fairness	"Now it's up to Senator Snowe. Tell her we can't lift our economy if w leave working families behind." *"Call Senator Snowe – [800-number]"*	11/5/01-11/18/01	2006	2006	☐	☐
"Afford"	Generic		☐		*Not available*	11/7/01-11/13/01		2002	☐	☐
"Afford"	LA-Sen	John Breaux	☐	Tax Fairness	"Now it's up to Senator Breaux to change that plan. We can't lift our economy if we leave working families behind." *"Call Senator Breaux – [800-number]"*	11/9/01-11/18/01	2004	2004	☐	☐
"Afford"	RI-Sen	Lincoln Chafee	☐	Tax Fairness	"Now it's up to Senator Chafee to change that plan. We can't lift our economy if we leave working families behind." *"Call Senator Chafee – [800-number]"*	11/9/01-11/18/01	2006	2006	☐	☐
"Afford"	OH-Sen	Mike Devine	☐	Tax Fairness	"Now it's up to Senator Devine to change that plan. We can't lift our economy if we leave working families behind." *"Call Senator Devine – [800-number]"*	11/9/01-11/18/01	2006	2006	☐	☐
"Afford"	OH-Sen	George Voinovich	☐	Tax Fairness	"Now it's up to Senator Voinovich to change that plan. We can't lift o economy if we leave working families behind." *"Call Senator Voinovich – [800-number]"*	11/9/01-11/18/01	2004	2004	☐	☐
"Afford"	IL-Sen	Peter Fitzgerald	☐	Tax Fairness	"Now it's up to Senator Fitzgerald to change that plan. We can't lift o economy if we leave working families behind." *"Call Senator Fitzgerald – [800-number]"*	11/9/01-11/18/01	2004	2004	☐	☐
"Afford"	PA-Sen	Rick Santorum	☐	Tax Fairness	"Now it's up to Senator Santorum to change that plan. We can't lift o economy if we leave working families behind." *"Call Senator Santorum – [800-number]"*	11/9/01-11/18/01	2006	2006	☐	☐
"Afford"	NV-Sen	John Ensign	☐	Tax Fairness	"Now it's up to Senator Ensign to change that plan. We can't lift our economy if we leave working families behind." *"Call Senator Ensign – [800-number]"*	11/14/01-11/18/01	2006	2006	☐	☐
"Call"	ME-Sen	Susan Collins	☐	Tax Fairness	"Call Senator Collins–tell her she's on the wrong side." *"Call Senator Collins – [local telephone]"*	11/23/01-11/28/01	2002	2002	☐	☐
"Call"	OR-Sen	Gordon Smith	☐	Tax Fairness	"Call Senator Smith–tell him he's on the wrong side." *"Call Senator Smith – [local telephone]"*	11/23/01-11/28/01	2002	2002	☐	☐

579

Index of Advertising Run Under Coalition Names With Other Groups, 1998-2001

Counsel Only

Title	Offices/Ballot/Candidates: District	Method: Planned in Radio Spot	Radio?	Issue(s) Discussed	Call to Action: Audio in normal type; Video in Italic type	Broadcast within 30 Days of Primary?	Broadcast within 60 Days of General Election?	Dates: Broadcast	Primary	General Election
"Book"	MO-Sen	Kit Bond	☑	Patients' Bill of Rights	"Call Senator Bond, 'Tell him to stop [illegible]' and pass a real patients' bill of rights."	☐	☐	6/28/00-7/8/00	2000	2000
"Book"	NE-Sen	Ben Nelson & Bush	☑	Tax Fairness	"Do call Senator Nelson at (local #) and tell him to fight for a tax cut that cuts [illegible] taxes, a tax cut for working families, that won't break the bank."	☐	☐	4/15/01-4/13/01; 4/16/01-4/18/01	2000	2000
"Book"	AR-Sen	Blanche Lincoln & Bush	☑	Tax Fairness	"Do call Senator Lincoln at (local #) and tell her to fight for a tax cut that cuts [illegible] taxes, a tax cut for working families, that won't break the bank."	☐	☐	4/15/01-4/13/01; 4/16/01-4/18/01	2004	2004
"Book"	SD-Sen	Tim Johnson & George W. Bush	☑	Tax Fairness	"Do call Senator Johnson at (local #) and tell him to fight for a tax cut that cuts [illegible] taxes, a tax cut for working families, that won't break the bank."	☐	☐	4/15/01-4/13/01; 4/16/01-4/18/01	2002	2002
"Book"	CO-Sen	Tom Campbell & George W. Bush	☑	Tax Fairness	"Do call Senator Campbell at (local #) and tell him to fight for a tax cut that cuts [illegible] taxes, a tax cut for working families, that won't break the bank."	☐	☐	4/15/01-4/13/01; 4/16/01-4/18/01	2000	2000
"Book"	RI-Sen	Lincoln Chafee & Bush	☑	Tax Fairness	"Do call Senator Chafee at (local #) and tell him to fight for a tax cut that cuts [illegible] taxes, a tax cut for working families, that won't break the bank."	☐	☐	4/15/01-4/13/01; 4/16/01-4/18/01	2000	2000
"Book"	GA-Sen	Max Cleland & Bush	☑	Tax Fairness	"Do call Senator Cleland at (local #) and tell him to fight for a tax cut that cuts [illegible] taxes, a tax cut for working families, that won't break the bank."	☐	☐	4/15/01-4/13/01; 4/16/01-4/18/01	2000	2000
"Book"	LA-Sen	Mary Landrieu & President Bush	☑	Tax Fairness	"Do call Senator Landrieu at (local #) and tell her to fight for a tax cut that cuts [illegible] taxes, a tax cut for working families, that won't break the bank."	☐	☐	4/15/01-4/13/01; 4/16/01-4/18/01	2002	2002
"Book"	MT-Sen	Max Baucus & Bush	☑	Tax Fairness	"Do call Senator Baucus at (local #) and tell him to fight for a tax cut that cuts [illegible] taxes, a tax cut for working families, that won't break the bank."	☐	☐	4/15/01-4/13/01; 4/16/01-4/18/01	2000	2000

[caption omitted]

DECLARATION OF JESSICA MITCHELL

I, Jessica Mitchell, hereby declare under penalty of perjury of the State of Florida:

1. I am a citizen of the United States and a resident of the State of Florida.

2. I am twelve years old, and was born on February 21, 1990.

3. Although I am not an adult, I understand that it is important to speak truthfully about the facts that I know, and admit honestly when I do not know something; I understand that not telling the truth in this statement would be a wrongful thing, and that I have the duty under the law to tell the truth.

4. Although I am not an adult, I understand the difference between facts and fantasy, and that my duty in making this statement is to testify to facts, and to avoid making up things that I cannot remember or do not know.

[end of page 1]

5. I am a Christian.

6. I am a home-schooled child, and I always have been.

7. Being home-schooled has also helped me to learn responsibility for myself and my schedule:

a. For example, I am accustomed to waking up by about 6:30 a.m.

b. After I wake I, I do all my chores in the morning.

c. Once my chores are finished, a friend and I will get some early morning exercise by riding bikes and such, usually while my mom is taking a walk.

d. By 7:30, we are back home and have breakfast.

e. And our school day starts, usually, no later than 8:15 a.m.

8. In addition to my studies at home about civics, government and history, I have had three great opportunities to learn about legislation and politics, by attending training programs sponsored by Teen Pact.

a. Teen Pact teaches kids about state legislation and political activities.

b. We listen to speakers, study materials, and have activities that allow us to look close up at legislative and political activities on the state level.

c. I have attended Teen Pact programs in Maine and Alabama, and I attended and graduated from the Teen Pact program held here in Florida this year.

d. During that program, I participated as a member of our "Rules Committee," we set up four committees similar to ones used in the legislature.

e. Also, we interviewed lobbyists at the legislature, and we heard from some

[end of page 2]

legislators, and had the opportunity to ask them questions.

f. Also, we visited with Governor Bush in the Capitol.

g. Participating in the Teen Pact programs has given me an understanding of how state legislatures work, including the process in the legislature and the outside activities of lobbyists and others who influence legislation.

h. I have become interested in government, politics and legislation, and the training at Teen Pact has increased my interest in these subjects, as well as my understanding.

9. As a family, we have also been involved in politics.

a. I worked with my mom and my sister in the mail room of the local headquarters for the 2000 Bush Presidential Campaign.

b. I also attended rallies for the campaign.

c. And I helped to assemble signs that the campaign distributed.

d. And I also walked a precinct with my family and distributed materials about the Bush campaign to encourage people to vote.

e. I also got to meet the President while he was still a candidate, because he was jogging in our neighborhood, so we got to meet him and I got a picture with him and got his autograph.

f. I also participated in some campaign activities when Bill McCollum ran, unsuccessfully, to become our United States Senator.

g. My sister worked on his campaign, and my best recollection is that we walked a precinct as part of an effort to encourage people to get out and vote, and to support his

[end of page 3]

campaign.

h. We are also volunteering to work for Governor Bush's re-election here.

i. We are going to be walking our neighborhood door-to-door handing out literature supporting him in October.

j. And, I think, we will also be distributing materials supporting Tom Feeney's campaign for the United States Congress.

k. In fact, I made a contribution to his campaign just recently, in the amount of Five Dollars.

l. That was from the money I earned in my own business.

10. The candidates that I have supported by volunteering, by the recent campaign donation, and by other activities, are ones that I have chosen after careful thought and research.

11. Because of my Christian faith, I will only support a candidate that is pro-life.

12. Also, I think that our government has gotten

too big, and that too many people have gotten used to relying on it, so I can only support candidates that agree with me about reducing the size of government.

13. And, I think of myself as a Republican because that is the political party that has taken a stand against abortion and for the rights of children before birth.

14. When I am thinking about a candidate to support, I do research to learn their views.

a. Sometimes another member of my family has materials about the candidate, a lot of the time my dad does.

[end of page 4]

b. Also, I use the Internet to visit the websites of candidates and study the information and materials available on the website.

15. I have learned that because of the new law on campaign reform that I will not be allowed to give the money I have earned to a candidate that I have chosen to support who is seeking federal elective office.

16. I have also learned that I will not be allowed to give the money I have earned to committees of the political parties I support or associate with.

17. Because of my interest in government, legislation, and politics, and because of my Christian faith, I plan and intend to continue seeking out candidates for federal elective office who represent my views and beliefs on important questions like the right to life of children before birth, and on the size of our government.

18. When I find such candidates, I plan and intend to make donations to them, just as I did recently with my donation to the campaign of Tom Feeney for United States Congress.

19. Working for the election of a candidate and giving financial support to the election of a candidate are two ways that I am able to demonstrate my association with those

candidates who share my beliefs and opinions.

20. While working on campaigns is an important activity, I also think that it is appropriate to give financial support to candidates.

21. So the new restrictions on my rights really do affect my rights and limit my ability to show that I share in the views and opinions of the candidates I choose.

22. A friend, Tali West, and I have a pet sitting business that we started together and

[end of page 5]

that we continue to run to this day.

a. It's called, "Doggone Perfect Pet Sitting."

b. We came up with the idea after reading an article in a magazine, the article listed several ideas for businesses that could be home-based.

c. We developed a price list for our services.

d. Also we prepared an advertisement that appears in our neighborhood newsletter, and that we have posted on the neighborhood bulletin boards.

e. We also put up flyers about our services.

f. As far as for our services, we walk the pets, feed them, clean up after them, and do the things that the pet's owner would do if they were at home.

g. Holly and I share the work, taking turns with the various jobs that we have, and we share the proceeds that we receive according to the work we do.

h. As part of our business plan, we take five percent of our proceeds and set them aside for business development, to make new flyers and to make t-shirts with our logo on them.

i. Two summers ago, I was able to put Two Hundred Dollars into my savings account as a result of our business, as well as pay for some things around the house that my puppy had torn up when he was little.

j. This year I added in about Fifty Dollars more.

23. I have saved, given or spent the money that I earn because of my own decisions, after talking with my parents about the choices I make.

[end of page 6]

a. For example, I give a tithe out of my earnings because it is a scriptural principle and because my mom and dad have taught me to do so.

b. And, I have talked with them about things I was thinking of buying; sometimes they have asked me to give them some more thought, but I cannot recall a time they have ever told me that I could not spend my money as I chose.

[subscription and signature omitted]

[caption omitted]

DECLARATION OF PAMELA MITCHELL

I, Pamela Mitchell, hereby declare under penalty of perjury of the State of Florida:

1. I am a citizen of the United States and a resident of the State of Florida.

2. I am above the age of 18, and I am competent to testify to the truth of the matters asserted in this Declaration.

3. I am married to Charles Mitchell.

4. We are the parents of three children.

5. Our youngest child is a daughter, Jessica Mitchell.

6. Jessica is twelve years old.

7. She was born on February 21, 1990, in Florida.

[end of page 1]

8. As a family we have chosen to provide for Jessica's education at home, rather than by sending her out to a local public or other school.

9. In addition, along with her older sister, we have arranged for her to receive education and training related to citizen participation in the government process by having her attend and participate in Teen Pact.

10. Teen Pact is a nonprofit organization that provides instruction on the legislative and political process; it accomplishes its educational purposes by hosting young people in their state capitals for a four day period of intensive training and activities. As a result of her participation in Teen Pact's activities, she understands parliamentary procedure and she has learned about how people are elected to office. Of course, we all still have a lot to learn, but together we are in the process of understanding how the system works.

11. In addition to Teen Pact, our home schooling program has provided Jessica with information about the government and its operation.

12. As a family, we consider citizen involvement in government, legislative processes and politics to be an important duty.

13. During the 2000 presidential campaign, we were involved in George Bush's campaign very heavily. We went to many of his rallies. We took absentee ballots around and collected those. We worked in the Orange County mail-room and sent out mailers. We walked precincts.

14. We are also helping now with Governor Bush's re-election campaign coming up in the next couple weeks.

15. Our involvement in both of these campaigns, past and present, is a family thing.

[end of page 2]

16. In other words, we did many of the campaign activities together, as a family, except, of course, during the Presidential campaign, our son was at college at that time so he could not participate with us directly. But Jessica did, as did her older sister, Julia. We all went down and did the stamping. Jessica walked one of the precincts with us, too. And she attended the rallies with us.

17. Jessica has expressed an interest in politics, even at her young age, and has willingly participated as a volunteer and supporter in the campaign activities I mentioned above.

18. I am aware that legal limits on the amount of money that I can give to a candidate for federal office have been enacted by Congress.

19. I am also aware that federal law prohibits me from giving money to a candidate for federal office in the name of another, even in the name of one of my children, whether Jessica, who is a minor, or James and Julia, who are adults.

20. I have never used my daughter's name, or any other person's, in making a political donation, in order to avoid limits that the law places on my ability to support candidates of whom I approve.

21. Jessica has an entrepreneurial inclination, and has acted on that inclination, even at this young age by investigating, selecting, beginning and operating her own business.

22. Jessica's pet-sitting business has produced an income for her, and she has funds from that business that she has placed in a savings account, and some funds that she keeps on hand to use for various things.

23. Jessica controls the money she has earned; she chooses whether and how to spend her money. Admittedly, she always consults with her dad and me, and on occasion we have

[end of page 3]

asked her to give further thought to an intended purchase, but we have never prohibited her from spending her money as she chose to do.

24. Jessica is a responsible child. She began her pet-sitting business so that she could afford the expenses related to having and raising a dog. She has used monies she earned in the pet-sitting business to care for her dog, and, she has also used some of those funds to repair or replace personal property here at the house that her dog damaged while it was a puppy.

[subscription and signature omitted]

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Civ. No. 02-582 (CKK, KLH, RJL)
Consolidated Actions

SENATOR MITCH McCONNELL, et at.,
Plaintiffs,

v.

FEDERAL ELECTION COMMISSION, et al.,
Defendants.

Direct Testimony of Edward L. Monroe
Fact Witness For Plaintiff Associated Builders And Contractors And For Plaintiff Associated Builders And Contractors Political Action Committee

1. My name is Edward L. Monroe, and I am Director of Political Affairs for Associated Builders and Contractors. In that capacity, I often go by the name "Ned Monroe." Associated Builders and Contractors ("ABC") is a plaintiff in one of these consolidated actions that seeks a declaration that certain provisions of the Bipartisan Campaign Reform Act are unlawful. ABC's affiliated political action committee is known as Associated Builders and Contractors Political Action Committee ("ABC PAC"). I am the Treasurer of ABC PAC. I am giving this testimony on behalf of plaintiff ABC and plaintiff ABC PAC.

2. I have been employed by ABC since the spring of 1997. Immediately prior to that, I was the political director for U.S. Senator John Warner's senatorial campaign in Virginia. Prior to that, I held several other political positions.

3. Plaintiff Associated Builders and Contractors, Inc. ("ABC") is a Maryland non-profit corporation exempt from federal income tax pursuant to I.R.C. § 501(c)(6) that is funded

[1]

primarily by membership dues. ABC is a national trade association representing more than 23,000 contractors and related firms in the construction industry. ABC's members, which include both unionized and non-union employers, share the philosophy that construction work should be awarded and performed on the basis of merit, regardless of labor affiliation. Representatives of ABC meet with officeholders, candidates, political party officials, and their respective staffs to encourage their support of legislation that advances ABC's goals. In addition, ABC has paid for broadcast communications that referred to clearly identified candidates for federal office and that aired within 60 days of a general election and within 30 days of a primary election.

4. ABC is the only national construction association devoted exclusively to the merit shop philosophy, the principle of providing the best management techniques, the finest craftsmanship, and the most competitive bidding and pricing strategies in the industry, regardless of labor affiliation. ABC is committed to developing a safe workplace and high-performance workforce through quality education and training with comprehensive safety and health programs.

5. ABC is concerned with many issues, which change over time. As a generality, however, ABC is active on free enterprise and tax issues. ABC favors the reduction of existing taxes and the avoidance of new taxes that impact our members. The reduction of federal, state and local taxes is one cornerstone of our association's philosophy.

6. ABC also is concerned with healthcare issues, such as rules affecting health maintenance organizations. This interest arises in two ways. First, healthcare expenses for employees is one of the primary expenses incurred by all our members. Those members are interested in legislation and regulations that impact the quality of healthcare they can offer their employees

and its cost. Second, ABC has an insurance trust which puts the association in the insurance business. It insures members for up to some $23,000,000 in health insurance premiums per year. So healthcare is another of the core issues addressed by our association.

7. ABC often engages in political communications, including broadcast ads, that seek to protect merit shop firms from legislative initiatives or regulatory proposals that would restrict market opportunities for merit shop companies. Such initiatives often originate with or have the vigorous support of labor unions or labor organizations. Such an initiative might seek to prevent firms from bidding on government contracts or government funded contracts unless the bidding firm hires union members or uses restrictive union work rules.

8. Initiatives of interest or concern to ABC members arise or are actively contested within 60 days of a general election or within 30 days of a primary election. If ABC and coalitions in which it participates could not run ads that mention officials of the executive branch, members of Congress, or candidates for federal office, it would be much more difficult to use broadcast advertising to educate or motivate the public to take action ABC believes appropriate in the circumstances. Proponents of such initiatives could time them within such regulated windows with the express purpose of suppressing effective communications that might marshal opposition to the proposals.

9. ABC is concerned by the chilling effects of BCRA §214(c). A coordination investigation, or the threat of one, could inhibit activities in which ABC has participated in the past. For example, on a wide variety of legislative matters, representatives of ABC meet with elected officers and their staffs to explore legislative and policy matters relevant to the construction community. These meetings on political subjects necessarily encompass discussion

[3 PCS CDP 484]

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

SENATOR MITCH McCONNELL, *et al*,
Plaintiffs,
v.
FEDERAL ELECTION COMMISSION, *et al*.
Defendants.

Civil Action No.: 02-CV-0582 (CKK, KLH, RJL)

CALIFORNIA DEMOCRATIC PARTY, *et al*,
Plaintiffs,
v.
FEDERAL ELECTION COMMISSION, *et al*.
Defendants.

Civil Action No.: 02-CV-0875 (CKK, KLH, RJL)

CONSOLIDATED ACTIONS

[3 PCS CDP485]

AFFIDAVIT OF TIMOTHY J. MORGAN

I, TIMOTHY J. MORGAN, swear and depose as follows, of my personal knowledge:

1. I am a Plaintiff in this action, and serve as the current Republican National Committeeman from California, elected by the state central committee of the California Republican Party ("CRP") in 1996. As National Committeeman, I serve as a member of the Republican National Committee ("RNC"), one of its one hundred sixty-six members. Currently, I serve as a member of the RNC's Budget Committee, which is responsible for budgeting and expenditures of RNC funds used in connection with national, state and local election activity and a myriad of purposes related to building the Republican Party and

communicating its principles and ideals. I have served as an active member of the RNC Redistricting Task Force, which has coordinated Republican legislative redistricting activities over the past six years. I am a member of the state central committee, the Executive Committee and the Board of Directors of the CRP, and also serve as the Chairman of its Rules Committee. I have been a member of the state central committee since 1981, of the Executive Committee since 1991, and of the Board of Directors since 1996. I have also served as Chairman of the Plaintiff Santa Cruz County Republican Central Committee, during the years 1993 -1996, and as a member of that Central Committee during the years 1979 - 1998. I am familiar with the structures, operations and activities of these organizations, the interrelationships between them, and the roles each plays in supporting and assisting the operations of the others, as well as their importance in establishing, building and maintaining the Republican Party at the national, state and local levels.

2. CRP's Organic Relationship With the National Republican Party:

The California Republican Party has a long, close association with its national party. General John C. Fremont, who led pro-United States forces in establishing the Bear Flag [3 PCS CDP 486] Republic in 1848 which led to the State of California's admission to the Union in 1850, served as one of the first two United States Senators from the new State of California in 1850 and 1851, and was the Republican Party's first Presidential nominee in 1856. CRP has of course been instrumental in electing as Republican Presidents Californians Richard Nixon and Ronald Reagan in the modern era.

3. CRP's Status Under California and Federal Laws:

CRP is the duly authorized and officially recognized Republican Party of the State of California. It is a "state committee" within the meaning and purposes of the FECA 2 USCA § 431(15). Under II CFR § *102.5(a),* CRP maintains a

"federal account" into which are deposited only contributions meeting the limits and prohibitions of the FECA (federally permissible contributions). CRP files regular public disclosure reports of its federal campaign activity with the Federal Election Commission ("FEC"). CRP is a registered political committee in accordance with California law under California Government Code § 84100 and files regular reports with the CA Secretary of State. CRP's non-federal campaign activities are regulated by the California Fair Political Practices Commission ("FPPC"). CRP pays for activities affecting both federal and non-federal political activity with funds drawn partly from its federal account, containing only federally permissible contributions, and partly reimbursed from its account governed by state law (its non-federal accounts).

CRP's federal and non-federal campaign committees are non-profit entities tax exempt under section 527 of the Internal Revenue Code.

4. CRP As An Association:

CRP has a little more than five million individuals who, as registered Republican voters, have joined together to advance common beliefs and principles. To advance those beliefs, CRP [3 PCS CDP 487] performs many functions, among them providing financial and material support to federal, state and local candidates, taking positions and publicizing those positions on public issues, including state and local ballot measures, and maintaining an administrative staff and structure to make its other goals possible, and to comply with extensive state and federal regulation. CRP opposed the Proposition 198 "blanket primary," and joined as a co-plaintiff in successfully challenging that legislation in *California Democratic Parly, California Republican Party, et al. v. Jones,* 530 U.S. 567 (2000).

5. CRP's Organizational Structure:

The CRP, local Republican county central committees,

and the Republican National Committee are part of a federated national and state associational group. CRP is the official State Republican Party organization under Part 3 of Division 7 of the California Elections Code, commencing with section 7250. Chapter 3 of Part 3, commencing with Section 7350, and the CRP's own bylaws, Exhibit "A" hereto and found on the internet at <http://www.cagop.org/bylaws.htm>, provide for a "state central committee."

The state central committee consists of approximately 1,500 regular and appointive members. Among the regular members are federal and state [3 PCS CDP 488] officeholders and candidate nominees, including the offices of Governor and eight other statewide constitutional officers, two nominees for U.S. Senate, fifty-two nominees for U.S. House of Representatives, forty nominees for State Senate, eighty nominees for State Assembly, and four nominees for State Board of Equalization. (Bylaws, Article II, Section 2.01.01(A).)

The state central committee is the governing body of the CRP. (California Elections Code § 7350 et seq.; Bylaws, Article I, Section 1.03.) However, the CRP also operates through a one-hundred member Executive Committee that includes a number of federal and state officeholders and sixteen representatives of Republican county central committees (Bylaws, Article II, Section 2.04.0 1), and a twenty five member Board of Directors, that includes one federal officeholder, a sitting member of Congress appointed by the California Republican Congressional Delegation, three state elected officeholders, and representatives of the association of Republican County Central Committee chairmen. (Bylaws, Article II, Section 2.05.01.)

6. Relationship to Republican County Central Committees:

California Elections Code section 7385 provides that the state central committee (CRP) shall conduct party campaigns on behalf of the Republican Party and the candidates of the

Republican Party.

The fifty-eight Republican County Central Committees are established by state law, and are governed by Chapter 4 of Part 3 of Division 7 of the California Elections Code, commencing with section 7400. These committees are separate, self-governing legal entities, and are authorized by Elections Code 7440 "to have charge of the Republican party campaign within their jurisdictions, under general direction of the {CRP] or [CRP's] executive committee." Federal officials and candidates who were nominated as party nominees for partisan offices, including State constitutional and legislative offices, the Board of Equalization, and federal offices, including nominees for U.S. Senate and U.S. House of Representatives who represent all or a portion of the area within the county's jurisdiction are "ex officio" members of the Republican county central committee, and participate in its decision-making, either personally or through designated alternates or agents. (Elections Code § 7404.)

These committees also are considered separate organizations under California's campaign finance reform laws. (California Government Code § 85205.) However, they are considered "subordinate party committees" under existing FECA law. (2 USCA § 434; 11 CFR [3 PCS CDP 489] § 100.14(b).)

These Republican County Central Committees' federal and non-federal campaign committees also are tax exempt under section 527 of the Internal Revenue Code.

CRP's regular membership also includes the chairmen of California's fifty-eight county central committee organizations as well as chairmen of various volunteer party organizations.
(Bylaws, Article 11, Section 2.01.01 (B)(7), (8).)

7. CRP's Role in the Federal Electoral College Process:

The CRP is authorized by California Elections Code section 7300 and by its bylaws to select Presidential electors to

participate in the Electoral College to elect a President and Vice President of the United States. (Bylaws, Art.IV, Section 4.01 et seq.)

8. CRP's Relationship to the Republican National Committee ("RNC"):

The CRP is a part of the RNC by provision of the Standing Rules of the Republican National Convention, as amended from convention to convention. CRP's elected chairman is a member of the RNC. (Rule No. 1, The Rules Of The Republican Party. as adopted by the 2000 Republican National Convention, July 31, 2000.) CRP elects two members of the RNC, a National Committeeman and a National Committeewoman. (RNC Rule No. 1; Bylaws Art.H, section 2.03.02(a).) The Republican National Committeeman and National Committeewoman are also members of the CRP's Board of Directors and Executive Committee. (Bylaws Art.II, section 2.05.01.)

Plaintiff Republican National Committeewoman Barbara Alby is a member of the RNC Executive Committee and the RNC Rules Committee. As set forth above, I am a member of the
RNC Budget Committee responsible for approving the budget and expenditures of the RNC.

CRP is part of the "federation" of State Republican parties that comprise the RNC, and [3 PCS CDP 490] the federated relationship of these States play in the RNC parallels the federal system embodied in our Federal Union of fifty States.

CRP derives program assistance from the RNC, and provides assistance to the RNC and to its sister State Republican parties through the national committee. Moreover, RNC has
provided resource and expertise to Republican County Central Committee programs, much as CRP has done and to which I have attested herein.

9. CRP's Principles and Goals:

CRP's principles, as set forth in Article I of its Bylaws, are "based upon the precepts of our Nation's Founding Fathers as reflected in the United States Constitution and the Bill of Rights, with particular emphasis upon the rights of the individual, limited governmental powers and equity under the law. The Committee affirms its belief in the free enterprise economic system, private property ownership, individual rights and representative government. The Committee shall forever be open, accessible to all and answerable to the people of the State of California." CRP's goals, as set forth in Article 1.00 of its Bylaws, are to nominate and elect "persons affiliated with the [Republican Party] to public offices at the federal, state, and local levels and supporting issues which reflect the Committee Platform and the principles set forth in [its] bylaws."

10. BCRA's Prohibition of National Committeemembers' Fundraising and Advising With Respect to State and Local Party Committees, State and Local Ballot Measures and Potentially State and Local Candidates:

As CRP's National Committeeman, and a member of its Budget Committee, I participate in the decisions of the RNC concerning its political program funding and other activities. Part of my role is to advise RNC on the California political climate, the opportunities to elect Republican local, stale and federal candidates in California. and the programs of the CRP and [3 PCS CDP 491]
local political party committees that are useful and important to the accomplishments of the RNC's and the CRP's objectives.

Also, because of my National Committeeman status, I am called on to assist CRP fundraising in various ways. I attend CRP fundraising events, both in the San Francisco Bay Area, at CRP conventions and meetings, and upon special invitation. Also, I am called on to assist Republican County Central Committees' fundraising in similar ways. In addition, I frequently report to the CRP and local Republican County

Central Committees on the activities and plans of the RNC, in particular with reference to California.

Because Section 323(a)(2) and 323(b)(2)(C) of the FECA, as enacted by section 101 of BCRA, together prohibit an officer or agent of a national party committee from soliciting, receiving, directing, transferring, or spending any non-federal funds permissible under California law or "Levin funds," I am uncertain whether my activities in connection with the fundraising events of CRP or of a Republican County Central Committee, including that of Plaintiff SANTA CRUZ COUNTY REPUBLICAN CENTRAL COMMITTEE, may be permitted or unlawful. Because of the potential criminal liability for violation of these provisions of Section 323 under Section 437g (d) of the FECA, and the potential exposure to substantial monetary fines and penalties therefore, I intend to avoid engaging in any activity that would place me in jeopardy, including:

a. Participating in any discussion or voting on any matter affecting the budget or political program of the CRP in my capacity as a voting member of its Board of Directors, because such activity may constitute the "spending" of non-federal funds or "Levin funds" subject to the aforementioned prohibitions, crimes and penalties. [3 PCS CDP 492]

b. Participating in any discussion or voting on any matter affecting the budget or program of the SANTA CRUZ COUNTY REPUBLICAN CENTRAL COMMITTEE for the same reasons.

c. Signing any fundraising appeal, letter or document either separately or jointly with any other member of the CRP or its Board of Directors which may solicit or direct the spending of non-federal or "Levin funds."

d. Making any request for the CRP to spend any funds for any political purpose, including but not limited to (1) the support of any state or local ballot

measure that may ask or direct voters to "Vote November X" if that date is a federal election date, or (2) the support of any candidate for local or state elective office that has or may receive non-federal campaign funds from the CRP or a Republican County Central Committee for the support of his or her campaign for state or local office because such candidate may ask or direct voters to "Vote November X" if that date is a federal election date, or to fund any local political party committee's voter registration, voter identification, or get-out-the-vote activity, or generic political party activity that encourages voters to vote or register to vote as a Republican.

11. BCRA's Impacts Upon Activities of the CRP and the Santa Cruz County Republican Central Committee:

I have reviewed the provisions of BCRA applicable to state and local political parties. I share the concerns that BCRA will have a devastating effect on their ability to perform their traditional central roles in the political process, and particularly their primary role to foster the achievement of Republican principles through the communication of ideas and issue [3 PCS CDP 493] positions, the fostering of association of persons who share Republican principles and ideals, and the nomination and election of candidates to California statewide constitutional offices, the State Legislature, to local offices, and also to federal offices.

12. Other BCRA Effects:

I have reviewed BCRA's other provisions as well. Again, while some of the provisions of BCRA are uncertain, and their application may depend on interpretation by the courts and the Federal Election Commission, my view is that a number of the provisions of BCRA also will have a very substantial impact on CRP's ability to raise funds to support its activities, and will

substantially impair its ability not only to campaign effectively in support of its candidates, but also to speak on ballot issues and other issues, and to associate and to foster association among Republicans at the local, state and federal levels. In particular, the cutting off of relationships between the national, state and local parties will have a very detrimental impact on the grass roots organizational capabilities of the Republican Party.

a. *Prohibition on State's National Committee Members' Fundraising or Participating in Spending Decisions for CRP:* As set forth more fully above, RNC officials including our Chairman and National Committeemembers will no longer be able to raise non-federal money for CRP. [3 PCS CDP 494]

b. *Prohibition on State's National Committee Members ' Fundraising or Participating in Spending Decisions for Republican County Central Committees:* RNC officials including our Chairman and National Committee members will no longer be able to raise non-federal money for Republican County Central Committees.

c. *Prohibition on Federal candidates and Officeholders' Fundraising for CRP and Republican County Central Committees:* Federal candidates and members of Congress officials including our Chairman and National Committee members will no longer be able to raise non-federal money for CRP or Republican County Central Committees.

d. *Diminution of Political Party v Speech With Respect to Ballot Issues and Other issues:* CRP will no longer be able to support ballot measures and in particular state and local initiative, bonds, and referenda, because organizations formed to support such measures under California law are organized as tax exempt organizations under Section 501(c)(4) of the Internal Revenue Code. CRP will be unable to make

contributions of money or "in-kind" to such organizations, which are considered "contributions" under California law and BCRA. Such ballot measure committees are organized as 501(c)(4) organizations, and often engage in what would be considered "federal election activity" including voter registration and get-out-the-vote because CRP's endorsement spending would be an "in-kind" contribution prohibited by section 323(d)(1) of FECA. [3 PCS CDP 495]

e. *Prohibition of Transfers of Non-Federal Funds from CRP to Republican County Central Committees:* CRP will no longer be able to provide substantial county support activities that help open party headquarters and phone banks during election periods, both under the prohibition of section 323(d)(2) of FEC as enacted by section 101 of BCRA, because such committees are organized under Section 527 of the Internal Revenue Code, and to a more limited extent, such CRP fund transfers will require federal or "Levin" funds and not funds that are permissible under California Government Code Section 85303(c) for these purposes.

f. *Substantial Interference with Grass Roots Voter Registration Activities of CRP's Operation Bounty:* CRP will be unable to operate its Operation Bounty program in which Republican County Central Committees, Republican volunteer clubs, and state and local candidates are the primary participants. All of these organizations are tax exempt Section 527 Internal Revenue Code organizations, including state and local candidates whose committees also are section 527 IRS organizations.

g. *Shifting of Voter Registration from Grass Roots Volunteers to Paid Professionals Will Discourage Grass Roots Participation in Party:* Rather than rely upon these grassroots volunteer organizations that are

Section 527 tax exempt organizations, CRP will be forced to rely more upon paid professional vendor operations, which will further discourage the grass roots volunteers, and frustrate their involvement in other party mobilization tasks. [3 PCS CDP 496]

h. *"Either/Or" Requirements of Section 441 a(d)(4) for Coordinated Expenditures and Independent Expenditures:* Because CRP would be prohibited from engaging in "coordinated expenditures" on behalf of a federal candidate if any local Republican County Central Committee made a single dollar of "independent expenditures" on behalf of such candidate, and vice versa, Republican County Central Committees would be prohibited from making "independent expenditures" such as putting a slate listing in a newspaper without coordinating that activity with the federal candidate, if CRP had made "coordinated expenditures" on behalf of the candidate. Because BCRA attempts to cut off coordination between the state and local parties in fundraising, and also restricts the interaction that they have traditionally had with respect to voter registration, phone bank and fundraising/transfer activity, their ability to communicate about such "coordinated expenditures" /"independent expenditures" activity also will diminish. CRP will need to spend resources to monitor such local activity in order to protect its ability to do "coordinated expenditures" on behalf of a federal candidate. Moreover, one, small last minute "independent expenditures"on behalf of a federal candidate by a Republican County Central Committee could make illegal previous, and more substantial, "coordinated expenditures" activity by the CRP.

i. *Fundamental Interference With California Law Promoting State and Local Campaign Contributions to and Expenditures by Political Parties:* BCRA conflicts with Proposition 34, and will directly affect CRP's and

RCCC's [3 PCS CDP 497] ability to accept contributions for state and local campaign activity specifically identified in Prop 34 to include voter registration and get-out-the- vote and other non-direct candidate support activities including communications with CRP's members, who are registered Republican voters (California Government Code § 85312). BCRA will interfere with CRP's and Republican County Central Committee's conduct of state and local election activity and associational rights.

j. *Third Party Supplanting of Role of Political Parties:* Parties like CRP and Republican County Central Committees will be supplanted by other third party groups, including Internal Revenue Code Section 501 (c)(4) groups that may engage in voter registration and even advocacy with respect to federal and non-federal candidates without BCRA restrictions.

The foregoing is true and correct. Executed under penalty of perjury under the laws of the United States this 3rd day of October 2002 at Santa Cruz, California.

/s/
TIMOTHY J. MORGAN

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

SENATOR MITCH McCONNELL, et al.,	)	Civil Action No. 02-0582 (CKK, KLH, RJL)
Plaintiffs,	)	
v.	)	
FEDERAL ELECTION COMMISSION, et al.,	)	**CONSOLIDATED ACTIONS**
Defendants.	)	

DECLARATION OF LAURA W. MURPHY

Pursuant to 28 U.S.C.§ 1746, I hereby declare as follows:

1. I am the legislative director of the American Civil Liberties Union ("ACLU"), a position I have held since February 2, 1993.

2. Plaintiff ACLU is a nationwide, non-profit, non-partisan organization with approximately 300,000 members dedicated to the principles of liberty and equality embodied in the Constitution. It is also a tax-exempt organization under § 510(c)(4) of the Internal Revenue Code. The ACLU is incorporated in Washington, D.C.

3. The ACLU engages in non-partisan legislative activities designed to influence federal legislation involving civil rights and civil liberties issues of national importance.

As a 501 (c) (4) organization, the ACLU does not engage in any federal election activity as defined by the Federal Election Campaign Act.

4. The organization's legislative efforts include many activities directly associated with lobbying, but do not involve contributions to candidates, political parties, political committees or other participation at fundraising functions sponsored by candidates or political organizations. The ACLU regularly meets, speaks or corresponds with members of Congress and Executive Branch officials concerning proposed or pending legislation or executive action that may affect civil liberties. For instance, following September 11, 2001, the ACLU has had numerous direct contacts with members of both the United States House of Representatives and the United States Senate urging restraint in the rush to adopt legislation giving the Department of Justice and other federal agencies sweeping law enforcement powers curbing important civil liberties. Similarly, the ACLU met with FBI Director Robert Meuller to discuss post 9/11 terrorism investigations by his office. The ACLU also routinely testifies before Congress, conducts staff briefings for Congress and provides members with ACLU position papers.

5. In addition to these direct contacts and correspondence, the ACLU holds press conferences, issues press releases, offers public commentary, and makes regular media and other public appearances staking out the organization's civil liberties positions on different legislative and executive branch initiatives. Sometimes the ACLU is advancing legislation, sometimes it is opposing legislation. The ACLU also works to build coalitions around common issues and is associated with at least 20 coalitions with a combined membership of over 250 organizations. The organization's legislative activities are frequently coordinated with other coalition partners. The ACLU also maintains a congressional score card on important civil

liberties issues and periodically publishes different guides on important civil liberties issues.

6. A successful lobbying campaign is not conducted in a vacuum. Typically, a campaign is undertaken in conjunction with coalition partners and individual members of Congress who support the legislation being advanced or opposed by the ACLU. For instance, the legislative campaign opposing the Bipartisan Campaign Reform Act and its predecessor bills involved many different organizations and individuals, including Senator Mitch McConnell's (R,KY) - office. In particular, the ACLU, its coalition partners, and Senator McConnell shared a common interest in educating the public about the First Amendment risks posed by the BCRA. Accordingly, ACLU staff met frequently with Senator McConnell's staff, as well as with others in Congress, during the debate over the BCRA and its predecessor bills. Senator McConnell's office conferred with the ACLU during its early efforts to promote the election reform legislation following the debacle in Florida during the 2000 presidential election. Another plaintiff in the case, Representative Bob Barr (R.GA), worked with the ACLU to oppose key provisions of the U.S.A. Patriot Act. These examples are illustrative of many others. The point is that the ACLU and other organizations often work with members of Congress to ensure that proposed legislation is consistent with civil liberties principles.

7. Under the coordination provisions adopted by the BCRA many of the foregoing legislative activities coordinated with members of Congress engaged in by the ACLU could be treated as contributions to the candidate and expenditures on behalf of the candidate subject to the prohibition and limitations of the Federal Election Campaign Act. Thus, while the ACLU does not coordinate activities with candidates for the purpose of influencing an election, many of its coordinated activities designed to influence legislative outcomes are subject to the Act's broad definition

of coordination. To take the most basic example, if the ACLU works with Senator Christopher Dodd (D,CT) on the election reform legislation, and if any of the ACLU's subsequent media statements, publications or mailings refer to the Senator's support of the legislation, the organization's expenditures on the campaign could be treated as a contribution to the Senator.

8. A successful lobbying campaign is not dependent on any single factor. However, for a membership organization like the ACLU that does not contribute to candidate's political parties, or House or Senate leadership committees, the media is often a critical means of promoting our legislative goals. In furtherance of these goals, the ACLU seeks to influence how members vote on pending legislation. One way that is accomplished is by educating the public about our concerns and using them to communicate their concerns to their elected Representatives. The most effective way to communicate with the public is through the print and broadcast media. Inevitably, many of the ACLU's statements involving legislation or executive branch policies, including print and broadcast communications, refer to a clearly identified candidate, member or executive branch official. High profile legislation, such as the "McCain-Feingold" Bill, is almost always publicly identified with its sponsor. Similarly, the ACLU's public statements supporting or opposing the President's policies invariably refer to the President by name.

9. Historically, the ACLU has been limited to earned media, which is dependent on news or editorial coverage of the organization's activities and points of view. Earned media has its limits, however. The ACLU has no editorial control over how and when its views are conveyed. Indeed, there is no assurance that a press release issued by the ACLU will even be picked up by a news organization. Similarly, press conferences may be poorly attended or

ignored by some news organizations. Moreover, because of the media's concern with presenting a variety of views or equal air time to other organizations, the ACLU's position may not be printed or broadcast at all. In short, there is a finite amount of print and broadcast , Internet and cable space, for which every advocacy organization competes.

10. Recognizing the limitations of relying exclusively on earned media, the ACLU has budgeted $200,000 this fiscal year for the purchase of legislative ads targeting specific members of Congress on legislation important to the ACLU. The first ad campaign was directed at Speaker Hastert in March 2002 urging him to bring the Employment Non-Discrimination Act (ENDA) to a full vote in the House. A copy of the text of the both the broadcast ad and the print ad are attached as exhibits to this declaration. The ad was broadcast on multiple Chicago and Aurora radio stations throughout the weekend of 3/15-3/17/02. Simultaneously, ads were taken out in the Chicago Sun Times and Aurora Beacon. In total $49,757 was spent for the radio and newspaper ads. The ad, in a dramatic "double play," showcased the problem of workplace discrimination in America and the campaign finance legislation that is the subject of this lawsuit. The ad was run in March. At that point, ENDA had started to move in the Senate after the legislation had been stalled in the House for some time. The ACLU hoped the ad would be a catalyst to help bring the legislation up for a vote. The ACLU also hoped to highlight the constitutional flaws of the BCRA, which was then being debated in Congress. As the ACLU pointed out at the time, the Hastert ads would have been illegal under the BCRA because they were aired within 30 days of a primary election, even though Speaker Hastert was running unopposed.

11. In addition to the Hastert ad, in September 2002 the ACLU contributed $10,000 to the Leadership Conference on Civil Rights for the purpose of financing a *media campaign, including* broadcast spots urging certain

targeted Represenatives and Senators to support the pending election reform legislation. The Leadership Conference is a national coalition of 185 national organizations. At the eleventh hour, our offices were contacted by a United State Senator's office and notified that there was significant progress on the legislation. In consultation with the Leadership Conference the ads were pulled. If the BCRA was in effect during this election cycle, these proposed broadcast ads would also have been illegal.

12. Finally, it is important to emphasize that the blackout periods imposed by the BCRA – 60 days before a general election and 30 day s before a primary – are often periods of intense legislative activity. During election years, the candidates stake out positions on virtually all of the controversial issues of the day. Much of this debate occurs against the backdrop of pending legislative action or executive branch initiatives. Some of the President's or Attorney General's boldest initiatives are advanced during election years – often within 60 days of a general election. This year, for instance, legislation creating a new federal department of Homeland Security is under consideration during this pre-election period. The ACLU took out a full page advertisement in Congress Daily and CQ Monitor on September 30, 2002, urging Congress to safeguard civil liberties in connection with its consideration of the "Gramm – Miller" and "Lieberman" versions of the Homeland Security legislation. A copy of the ad is attached to this document. Thus, it is not unusual for the ACLU to be at its most vigilant and active during an election year, especially in the final days leading up to the election. Throughout this and other election years, the ACLU has issued numerous press releases, held numerous press conferences, and made numerous public appearances and commentary on pending legislation. Much of this activity occurred during the final 60 days before an election or otherwise during the broadcast ban blackout dates governing Presidential primaries. Much

of this activity and many of our communications refer to bills and amendments that often include the names of members of Congress or refer to particular actions by a member of Congress. While these activities are excluded from the BCRA's broadcast ban provisions, any paid broadcast media on the very same issues is illegal.

13. I am the custodian of the records of the legislative materials that have been produced in discovery or disclosed to the defendants in this case pursuant to the court's status scheduling Order. I am informed by counsel that these documents may be used at trial. They are true and correct copies of documents that are created and maintained in the ordinary course of the ACLU's legislative activities. Additionally, I certify that the Hastert and Congress Daily and CQ Monitor ads attached to this declaration were broadcast and/or printed on the dates indicated herein and that the text is accurate.

I declare under penalty of perjury, that the foregoing is true and correct.

Executed on this 3rd day of October 2002.

_____

Laura W. Murphy

Exhibit A

Copy of Hastert radio ad paid for by the ACLU. The ad was broadcast on multiple Chicago and Aurora, Illinois radio stations the weekend of 3/15 – 3/17/02.

ACLU- Radio

60 Seconds

R201-x13 – ENDA Delays

Sound Effect: Long Tympani/ Drum Roll

Male Announcer – Master of Ceremonies (during sound effect): *And now...*

Sound Effect: Drum Roll Ends with Cymbal Crash
Sound Effect: 2 Seconds of Silence

Male Announcer: .....We're Waiting

Sound Effect: Long Tympani/ Drum Roll Starts Again
Sound Effect: Drum Roll Ends with Cymbal Crash
Sound Effect: 2 Seconds of Silence

Male Announcer: *Waiting for our Congressman,* (Sound Effect Music Up – Pop Goes the Weasal or Circus Music) *Dennis Hastert, to protect everyone from discrimination on the job.*

As speaker of the House, Representative Hastert has the power to stop the delays and bring the Employment Non-Discrimination Act – ENDA – up for a vote in Congress. It's about fairness. It's time to ensure equal rights for all who work, ***including lesbians and gay men,*** *and make sure that it's the quality of our work that counts, and nothing else.* (Music Out.)

Male Announcer: *So Congressman Hastert*

Sound Effect: Tympani/Drum Roll

Male Announcer – Master of Ceremonies (during sound effect): *What will it be?*

Sound Effect: Drum roll ends with Cymbal Crash

Male Announcer: *Protecting workers from discrimination, or more delays?*

Female Announcer: Take action now. Send Speaker Hastert a letter urging him to support fairness and bring ENDA to the floor by going to www.aclu.org/enda.

Male Announcer: Paid for by the American Civil Liberties Union.

Exhibit B

Copy of Hastert print ad paid for by the ACLU. The ad was taken out in the Chicago Sun Times and Aurora Beacon the weekend of 3/15 – 3/17

WE'RE WAITING...

Waiting for our Congressman, Dennis Hastert, to protect everyone from discrimination on the job.

As Speaker of the U.S. House of Representatives, Rep. Hastert has the power to stop the delays and bring the Employment Non-Discrimination Act — ENDA — up for a vote in Congress. It's about fairness. It's time to ensure equal rights for all who work, including lesbians and gay men, and to make sure that it's the quality of our work that counts, and nothing else.

So, Speaker Hastert: what will it be? Protecting workers from discrimination or more delays?

TAKE ACTION NOW!

Visit www.aclu.org/ENDA to send Speaker Hastert a letter urging him to support fairness and bring ENDA to the floor.

Exhibit C

Copy of ACLU's full page advertisement in Congress Daily and CQ Monitor on September 30, 2002.

The Homeland was established with a Bill of *Rights*.

Please don't secure it with a Bill of *Wrongs*.

In creating a new Department of Homeland Security, the Senate must do more to protect the civil rights and civil liberties of everyone in America.

The Gramm-Miller version of the homeland security bill runs roughshod over important civil rights; the Lieberman bill does not go far enough in ensuring that those rights are protected.

ANY HOMELAND SECURITY BILL THAT PASSES THE SENATE MUST:

★Create a Civil Rights Officer, Privacy Officer and Deputy Inspector General position for Civil Rights and Civil Liberties to ensure that this huge new agency protects our safety and our freedom.

★Prevent the establishment of the Terrorism Information and Prevention System (TIPS). Republicans and Democrats have profound concerns about any government program that would enlist neighbors to spy on neighbors.

★Stop the Customs Service from engaging in racial profiling. Customs officials must be held accountable if they continue this ineffective and morally wrong practice.

★Ensure that immigrant children who arrive in the United States unaccompanied by an adult have access to guardians and legal counsel.

★Create a proper balance between services provided to immigrants and the enforcement of immigration laws and guarantee due process under law to all in America.

American Civil Liberties Union ★ Leadership Conference on Civil Rights
Mexican American Legal Defense and Educational Fund ★ National Council of La Raza
National Immigration Law Center ★ Open Society Policy Institute ★ People for the American Way

106th Congress
Congressional Action During the 60 Days Prior to November Election on Bills of Interest to the ACLU

Capital Punishment:

- "Sense of Congress" regarding the obligation of grantee states to ensure access to post-conviction DNA testing and competent counsel in capital cases (Amdt. 4345 to S. 3045): Introduced in the Senate on 10/26/2000.

Chruch-State:

- Bill to protect religious groups in land-use disputes (S 2869) signed by the President on 9/22/2000; P.L. 106-274.
- Allows faith-based organizations to receive federal support for programs to help low income fathers get more involved in their families' lives (HR 4678): Passed House 9/7/2000.

Criminal Justice:

- Provide grants to states to process backlog of DNA evidence (HR 4640): Passed House 10/2/2000.
- Pressure states into requiring HIV testing of rape suspects who have been formally charged, by threatening to withhold federal crime-fighting block grant money (HR 3088): Passed House 10/2/2000.
- Aimee's Law: cuts federal crime fighting money to states if convicted murderers & rapists did not serve stiff sentences and went on to commit offense in another state (part of HR 3244): Passed Senate 10/11/2000.

Gay and Lesbian Issues:

- Repeal federal charter of Boy Scouts, in reaction to Supreme Court: decision that allows Boy Scouts to discriminate against homosexuals (HR 4892): Defeated in House 9/13/2000.
- Prohibit using local or federal funds for needle exchange (amendment to HR 4942): Passed House 9/27/2000.
- Prohibit the use of Federal funds for the conduct or support of programs of HIV testing that fail to make every reasonable effort to inform the individuals of the results of the testing (HR 5615): Introduced in the House on 10/11/2000.

Hate Crimes:

- Expansion of federal hate crimes law (amendment to S 2549): House voted to instruct conferees to accept amendment 9/13/2000; conferees dropped language from bill 10/5/2000.

Immigration:

- Allow some immigrants who committed minor crimes long ago to apply to stay in US and not be deported; part of "Fix '96" (HR 5062); Passed House 9/19/2000.

Internet Filtering

- Force schools and libraries to use technology protection measures to block access by children to web pornography (amendment to HR 4577): Conferees added this provision to the bill 10/23/2000.

Media & Violence

- Require violent TV programming be limited to hours when children are not likely to be a substantial part of audience (S 876): Approved by Senate Commerce committee 9/20/2000.

Physician-Assisted Suicide:

- Overturns Oregon's law that permits physician-assisted suicide (amendment to HR 2614): Passed House 10/26/2000; Filibustered in Senate 10/27/2000.

Privacy:

- Restrictions on law enforcement use of electronic surveillance (HR 5018): Approved by House Judiciary subcommittee 9/14/2000; Mark-up by House Judiciary committee 9/20/2000.
- Creation of commission to study issue of privacy on the internet (HR 4049): Defeated in House 10/2/2000: failed to get 2/3's majority needed for passage under suspension of rules.
- Prohibit the appearance of Social Security account numbers on or through unopened mailings of checks (HR 3218): Passed House 10/18/2000; Passed Senate 10/25/2000.
- Enhance privacy protections for individuals, and to prevent fraudulent misuse of Social Security account numbers (HR 4857): House full committee mark up on 9/28/2000.

Reproductive Rights:

- Funding prohibition in DC Approp. (HR 4942; HR 5633): Passed both House and Senate on 11/14/2000.
- "Conscience clause" to employee-sponsored health plans coverage of contraceptives (amendment to HR 4942): Passed House 9/14/2000.
- Abortion restrictions on international family planning aid (HR 4811): Conference Committee appointed 10/19/2000; House debates conference report 10/25/2000;
- Define "human being;" seeks to protect humans born alive at any stage of pregnancy (HR 4292): Passed House 9/26/2000.
- Prevent abortion protestors convicted of violent crimes from seeking bankruptcy protection to avoid paying hefty legal penalties (amendment to S 3046): Senate voted to proceed with debate on 10/19/2000.
- Prohibit use of funds to distribute postcoital emergency contraception "morning after pill" on elementary or secondary school premises(HR 4577, Labor/HHS Approp.): Pre. Coburn announces intention to offer motion to instruct House conferees on this amendment on 9/18/2000.

Secret Evidence

- Makes it harder for INS to use secret evidence to deport immigrants or to deny tem asylum (HR 2121): Approved by House Judiciary Committee 9/26/2000.

Terrorism

- Provide clearer coverage over threats against former Presidents and members of their families (HR 3048):

House disagreed with certain Senate amendments on 10/25/2000.

Trafficking Victims:

- Combat trafficking of persons, especially into the sex trade, slavery, and slavery-like conditions (HR 3244): Passed Senate 10/11/2000.

Violence Against Women:

- Reauthorization of VAWA (HR 1248): Passed House 9/26/2000; Passed Senate as par of HR 3244 0/11/2000.

Voting Reform

- Proposing a constitutional amendment to abolish the electoral college and to provide for the direct popular election (SJRes 56): Introduced in the Senate on 11/01/2000. Proposing a constitutional amendment to abolish the electoral college (HJRes 113): Introduced in the House on 10/12/2000.

[THIS PAGE INTENTIONALLY LEFT BLANK]

[1 (8 PCS/MC 262)]

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Senator Mitch McConnell, *et al.*,	)	
Plaintiffs,	)	Case No. 02-0582
v.	)	(CKK, KLH, RJL)
	)	*All consolidated*
Federal Election Commission, *et. al.*,	)	*cases.*
Defendants.	)	

Declaration of David N. O'Steen, Ph.D.
Executive Director,
National Right to Life Committee, Inc.

I, David N. O'Steen, declare the following based on personal knowledge and to the best of my recollection and belief:

1. I am an adult citizen of the United States of America.

2. I am the Executive Director of National Right to Life Committee, Inc. ("NRLC"), in which capacity I am familiar with the activities of NRLC.

3. NRLC, incorporated in 1973, was founded for the purpose of promoting respect for the worth and dignity of all human life from conception to natural death.

4. NRLC is a District of Columbia corporation exempt from federal taxation under I.R.C. § 501(C)(4).

5. NRLC has approximately 3,000 local chapters and fifty state affiliates.

6. NRLC regularly makes disbursements for the direct costs of producing and airing "electioneering communications" in a calendar year that: (a) refer to clearly identified candidates for federal office, (b) are made within 60 days before a general, special or runoff election for the [2 (8 PCS/MC 263)] office sought by the candidates and within 30 days before primary

elections, preference elections, and conventions and caucuses of political parties with authority to nominate candidates for the offices sought by the candidates, and (c) are targeted to the relevant electorate.

7. The purpose of these ads is to effect legislation.

8. On a regular and recurring basis, NRLC (a) lobbies candidate legislators on legislation, (b) consults with both incumbent and challenger candidates on their positions on issues, (c) engages in "electioneering communications" (as defined by the Act); and (d) publishes printed communications, including what are known as "voter guides."

9. Some of these communications are done without any communication with any candidate and some are done after communication with a candidate.

10. NRLC qualifies as an "MCFL-type" organization under *FEC v. Massachusetts Citizens for Life*, 479 U.S. 238 (1986), in that it was not established as a business corporation or labor union, and has no shareholders or other persons affiliated with it who have a claim on its assets or earnings; its organizational purposes are to engage in public welfare activities, and its major purpose is not to nominate, elect, or defeat federal or state candidates; no part of its net earnings inure to the benefit of any private shareholder or individual and except for reasonable compensation for services rendered to the corporation it does not afford any pecuniary gains to its members, directors, officers, or any other persons; it has no capital stock; receipts from other corporations are *de minimus*, and its business income is insubstantial; and it is not affiliated with any political candidate, political party, or campaign committee. [3 (8 PCS/MC 264)]

11. NRLC is also an "expressive association" as described in *Boy Scouts of America v. Dale*, 530 U.S. 640 (2000).

12. NRLC and NRL-ETF communicate to members of NRLC through a publication called "National Right to Life

News." This paper is paid for from general treasury funds with the exception of those portions that are paid for by NRL-PAC because they expressly advocate the election or defeat of a federal candidate.

13. NRLC has raised substantial funds in the past with the assistance of Representatives and Senators who were willing to record messages and sign thank you letters to potential contributors.

14. NRLC has received donations from political parties or committees in the past and persons associated with political parties or committees have assisted NRLC in raising funds.

15. NRLC intends to continue its described activities that are banned by the BCRA, but will not do so while the BCRA is in effect.

16. In my capacity as Executive Director of NRLC, I am responsible for overseeing the activities of NRLC's internal 501(C)(3) fund, the National Right to Life Educational Trust Fund ("NRL-ETF"). Thus, I am familiar with the activities of NRL-ETF.

17. NRL-ETF sponsors educational advertising and develops fact sheets, brochures, and booklets detailing the wonders of fetal development, abortion's impact on America, and the threat of euthanasia.

18. NRL-ETF has spent, and intends to do so again, in a calendar year on broadcast and print communications that mention no candidate but advocate for or against issues that are hotly [4 (8 PCS/MC 265)] contested in contemporaneous political campaigns on which candidates running in the same geographic area have taken a position. Under the vague alternative definition of "electioneering communication," which examines whether a "communication . . . promotes or supports" or "attacks or opposes a candidate," BCRA § 201(a), it is unclear whether such

conduct would be considered an "electioneering communication" in that context.

19. NRL-ETF qualifies as an "MCFL-type" organization under *FEC v. Massachusetts Citizens for Life*, 479 U.S. 238 (1986), in that it was not established as a business corporation or a labor union, and has no shareholders or other persons affiliated with it who have a claim on its assets or earnings; its organizational purposes are to engage in public welfare activities, and its major purpose is not to nominate, elect, or defeat federal or state candidates; no part of its net earnings inure to the benefit of any private shareholder or individual, and except for reasonable compensation for services rendered to the corporation it does not afford any pecuniary gains to its members, directors, officers, or any other persons; it has no capital stock; receipts from other corporations are *de minimus*, and its business income is insubstantial; and it is not affiliated with any political candidate, political party, or campaign committee.

20. NRL-ETF is an "expressive association" as described in *Boy Scouts of America v. Dale*, 530 U.S. 640 (2000).

21. NRL-ETF also sponsors the "Proudly Pro-Life" banquet which has been attended by Representatives and Senators, some of whom have been honored by receiving the "Proudly Pro-Life Award." As an honoree their name and likeness have been used in fund raising materials. [5 (8 PCS/MC 266)]

22. NRL-ETF intends to continue in its described activities that are banned by the BCRA, but will not do so while the BCRA is in effect.

23. Also, in my capacity as Executive Director of NRLC, I am charged with overseeing the operations of the National Right to Life Political Action Committee ("NRL-PAC").

24. NRL-PAC, organized in 1979, is an internal § 527 fund of NRLC that is registered with the Federal Election Commission ("FEC") as a PAC subject to FECA.

25. NRL-PAC regularly makes contracts for independent expenditure communications in federal elections days, weeks, and months in advance of the time the actual independent expenditures are made.

26. NRL-PAC has suffered harassment and interference with contractual relationships as a result of federal candidates learning about arrangements with broadcasters to air independent expenditure communications in opposition to these candidates.

27. NRL-PAC intends to continue making independent expenditures, but its freedom of expression is burdened by the necessity of reporting when contracts are made instead of when the independent expenditure is made.

28. For the fiscal year ending April 30, 2002, NRLC's gross annual revenues were approximately $10,783,303.

29. For the fiscal year ending April 30, 2002, NRL-ETF's gross annual revenues were approximately $4,109,773.

30. For the fiscal year ending April 30, 2002, NRL-PAC's gross annual revenues were approximately $240,233. [6 (8 PCS/MC 267)]

31. To the best of my knowledge information and belief donations made to NRLC, NRL-ETF, and NRL-PAC, inclusive, by individuals, totaled approximately $13,578,862 for the most recent fiscal year.

32. Donations made by organizations, including corporations, nonprofit, religious and other similar groups were approximately $295,124 for the most recent fiscal year.

33. In addition to paying for the administrative costs of NRL-PAC, NRLC's general treasury funds are used for other activities.

34. These other activities include (a) lobbying, (b) communications with NRLC members regarding federal, state and local elections, and (c) communications with NRLC members and the general public regarding issues.

35. The issues on which NRLC lobbies are listed on the Lobbying Disclosure Act Reports that the NRLC files with the Secretary of the Senate and the Clerk of the House of Representatives, which are publicly available documents.

36. In accordance with applicable federal, state, and local law, NRLC or NRL-PAC have engaged in, and intend to engage in such activities as voter identification, get-out-the-vote efforts, polling, telephone banks designed to encourage voting, what are known as "voter guides," independent expenditures, and contributions to candidates.

37. NRLC, NRL-ETF, and NRL-PAC each raise funds through telemarketing, direct mail, and/or other fund raising mechanisms such as dinners, etc. [7 (8 PCS/MC 268)]

38. Each of the following paragraphs is intended to authenticate the attached documents and demonstrate the activities engaged in by NRLC, NRL-ETF, and NRL-PAC. Many of these activities will be severely burdened or forbidden once the BCRA takes effect.

39. NRLC, NRL-ETF, and NRL-PAC oppose all forms of abortion, euthanasia, and human cloning.

40. NRLC strongly supports a ban on Partial-birth Abortions, i.e. the procedure in which a physician delivers an unborn child's body until only the head remains inside the womb, punctures the back of the child's skull with a sharp instrument, and sucks the child's brains out before completing the delivery of the dead infant.

41. NRLC helped originate the Partial-Birth Abortion Ban Act, which was originally introduced in 1995 by Congressman Charles Canady (R-FL), who retired from Congress in 2000.

42. NRLC, NRL-ETF, and NRL-PAC have long provided educational materials about the development of unborn babies and facts about abortion. Attached hereto as Exhibit A-1 is a true and accurate copy of an educational document produced by

NRL-ETF entitled "The Basics: a compilation of recent and noteworthy information on the abortion issue."

43. Attached hereto as Exhibit A-2 are true and accurate copies of the supporting documents and text of an ad, produced by NRLC, entitled "Congress to Vote November 1 on Banning Partial-birth Abortions," dated October 23-26, 1995. [8 (8 PCS/MC 269)]

44. This ad ran in the Manchester Union-Leader and mentions the names of U.S. Senator Bob Smith, Senator Judd Gregg, Congressman Bill Zeliff and Congressman Charles Bass.

45. Attached hereto as Exhibit A-3 is a true and accurate copy of a document, produced by NRLC, entitled "Update on Bill to Ban Partial-Birth Abortions," dated November 6, 1995.

46. This document, addressed to "Reporters, Editors, and Other Interested Parties, was intended to educate the media on the partial-birth abortion procedure and the bill to ban it.

47. This document also mentions the names of several Congressmen.

48. Attached hereto as Exhibit A-4 are true and accurate copies of a three versions of an ad called "Brenda Pratt Shafer \ PBA Advertisement." These ads, produced by NRLC, describe the partial-birth abortion procedure, mention the name of President Bill Clinton and the fact that he vetoed legislation that would have stopped partial-birth abortion, and were run after April 10, 1996 and prior to the 1996 Presidential election.

49. Because the year-end results from 1997 donor solicitations showed that "a letter signed by Congressman Henry Hyde had almost twice as high a return rate as the average of other fund raising letters" in 1997, NRLC decided to ask Representative Hyde to assist us again with fund raising in 1998.

50. Attached hereto as Exhibit A-5 are true and accurate copies of a proposal to have Congressmen Henry Hyde help

solicit donations for NRLC and the proposed scripts and donation fulfillment letter for his assistance. [9 (8 PCS/MC 270)]

51. In 1998, as a result of what NRL-ETF perceived to be a misperception by the news media and the public about the actual procedure known as partial-birth abortion, NRLC produced several ads to educate the public about the procedure and that the American Medical Association has determined that the procedure is "not good medicine."

52. Attached hereto as Exhibit A-6 are true and accurate copies of the scripts of those ads, called "Soft Doctor," "Hard Doctor," "Soft Scissors," "Hard Scissors," "Soft Baby," "Hard Baby," and "Doctor" in both Spanish and English translations.

53. As a part of its educational activities, NRL-ETF produces a newsletter called "Life Cycle."

54. The September 1999 issue of "Life Cycle" focused on partial-birth abortion. A true and accurate copy of that newsletter is attached hereto as Exhibit A-7.

55. As a part of its continuing efforts to protect the life of the unborn, NRLC has lobbied for several years for the passage of the Partial-Birth Abortion Ban Act.

56. On March 28, 2000, NRLC produced a document called "Key Facts on the Partial-Birth Abortion Ban Act. A true and accurate copy of that document is attached hereto as Exhibit A-8.

57. In 2000, NRLC produced educational materials called "Test Your Knowledge." Included in these materials were questions regarding presidential candidates George W. Bush and Al Gore and their positions on abortion. A true and accurate copy of those materials are attached hereto as Exhibit A-9. [10 (8 PCS/MC 271)]

58. As a part of its grass roots lobbying to override President Clinton's veto of the Partial-birth Abortion Ban Act, NRLC initiated a campaign called the "National Campaign to End

Partial-Birth Abortions Hotline." This service encouraged the public to assist in lobbying for the override by sending messages through Western Union to be delivered to the caller's Senators, Representatives and President Clinton. It also allowed the caller to order educational materials to distribute if the caller wanted to be so involved. A true and accurate copy of the voice mail script of that hotline is attached hereto as Exhibit A-10.

59. Attached hereto, as Exhibit A-11, is a true and accurate copy of the thank you letter sent to those who requested Western Union messages be sent via the hotline.

60. Attached hereto, as Exhibit A-13, is a true and accurate copy of the ad called "What the nurse saw . . ." which was published to educate the public on the partial-birth abortion procedure and how to get involved with the hotline.

61. Also, as a part of its lobbying efforts to pass the Partial-Birth Abortion Ban Act, NRLC produced educational ads on the partial-birth abortion procedure and urged people to call their specific Senator, mentioned by name, who had voted against the act and ask him to change his vote.

62. Attached hereto, as Exhibit A-12, is a true and accurate copy of one such message called "You know its wrong" and asking "Why doesn't Russ Feingold?"

63. Although not directly related to abortion, euthanasia, or cloning, NRLC, NRL-ETF, and NRL-PAC have become involved in the fight against the BCRA and its predecessor bills [11 (8 PCS/MC 272)] because of the negative impact they would have on our educational and lobbying efforts to protect the right to life.

64. On November 8, 1995, NRLC sent a letter to Senators explaining its problems with S.1219, the "Senate Campaign Finance Reform act of 1995." Specifically, it explained that NRLC, NRL-ETF, and NRL-PAC would be harmed because (a) it would "almost entirely eliminate involvement in the political

process for ordinary citizens who are not independently wealthy," (b) the new definition of "express advocacy" would include "issue advocacy" such that citizen groups that were not PACs could not inform the public about the candidate's positions and voting records, and (c) that it "authorized an unconstitutional prior restraint" by allowing the FEC to enjoin an expenditure where there is a "substantial likelihood that a violation . . . is about to occur." A true and accurate copy of that letter is attached hereto as Exhibit B-1.

65. On December 12, 1995, a similar letter was sent to Representatives regarding H.R. 2566, the "House Bipartisan Clean Congress Act of 1995." In addition to the above objections, H.R. 2566 was problematic because the provision "balancing spending limits with independent expenditures is unworkable." A true and accurate copy of that letter is attached hereto as Exhibit B-2.

66. On March 13, 1996, I, David N. O'Steen, testified on behalf of NRLC and NRL-PAC before the U.S. Senate Committee on Rules and Administration Campaign Finance Reform. During that testimony, I outlined the above objections and explained their effect on NRLC and NRL-PAC. A true and accurate copy of that statement is attached hereto as Exhibit B-3. [12 (8 PCS/MC 273)]

67. On February 19, 1997, NRLC Legislative Director, Douglas Johnson, prepared "A Critique of the Speech-Restriction Provisions of the Shays-Meehan (HR 493) and Farr (HR 600) 'Campaign Reform' Bills." Specifically that critique outlined the First Amendment protections for political speech and how each bill contained provisions suppressing issue advocacy and independent expenditures. A true and accurate copy of that document is attached hereto as Exhibit B-4.

68. On that same day, Mr. Johnson also prepared and distributed "A Critique of the Speech-Restriction Provisions of

the McCain-Feingold 'Campaign Reform' Bill." This critique, like the one above, described the First Amendment protections for political speech and how the provisions of S. 25 suppress issue advocacy and independent expenditures. A true and accurate copy of that document is attached hereto as Exhibit B-5.

69. On April 3, 1997, Douglas Johnson, NRLC Legislative Director, and Mike Beard, President of the Coalition to Stop Gun Violence, co-issued an article entitled "Thanks, Senator, But We Really Don't Need Your Permission to Publish Your Voting Record." This article details how "pending 'campaign reform' proposals would gag [their] institutions." A true and accurate copy of that article is attached hereto as Exhibit B-6.

70. On Aril 16, 1997, NRLC issued a press release criticizing a caucus of 23 Democratic members of the House of Representatives, known as the "Blue Dogs" for proposing "a so-called 'campaign reform' bill that would severely restrict the right of citizens and associations of citizens to communicate with the public about those who hold or seek public office." A true and accurate copy of that press release is attached hereto as Exhibit B-7. [13 (8 PCS/MC 274)]

71. On April 25, 1997, I, David N. O'Steen, testified before the Bipartisan Freshman Campaign Finance Reform Task Force, U.S. House of Representatives, regarding the "Freedom of Political Speech: The Heart of a Healthy Democracy." During that speech I spoke on behalf of NRLC and NRL-PAC and explained how the so-called campaign finance reform would have disastrous consequences for our organizations. A true and accurate copy of that statement is attached hereto as Exhibit B-8.

72. As a part of that testimony, I pointed out that the current "campaign finance reform" proposals would harm citizen groups such as NRLC by (a) redefining constitutionally protected "issue advocacy" as highly regulated "express advocacy," (b) limiting the amount that may be spent on "independent expenditures," (c)

limits publication of candidates' voting records and positions on current issues," (d) authorizing the FEC to seek injunctions to prevent political speech that it believes will violate the law, and (e) enhancing the political power of the institutional media at the expense of the ordinary citizen and citizens' group.

73. On July 21, 1997, NRLC published a press release detailing how a "'campaign reform' plan being promoted by the League of Women Voters (LWV) would trample on the rights of issue-oriented groups to communicate directly with the public regarding positions and votes of politicians." The LWV plan would ban "any paid communication with the general public that uses a federal candidate's name or likeness within ninety days of a primary or of a general election." Such a ban would harm issue-oriented citizen groups such as NRLC by prohibiting them from distributing congressional scorecards or any other voter education efforts [14 (8 PCS/MC 275)] for three months before each election. A true and accurate copy of that press release is attached hereto as Exhibit B-9.

74. As a part of its lobbying activities, NRLC sent a letter to Senators on September 9, 1997, explaining its opposition to the "revised" McCain-Feingold bill. Specifically, this letter details how "the First Amendment is not a 'Loophole'" and explains that the "definition of 'contribution' is so broad that it would effectively ban incorporated citizen groups or unions from engaging in many constitutionally protected lobbying and issue-advocacy activities at any time of the year" and that by treating issue-oriented groups as PACs and requiring them to file detailed reports, issue advocacy would be suppressed.

75. On September 15, 1997, NRLC issued a similar letter to Members of the House of Representatives. A true and accurate copy of that letter is attached hereto as Exhibit B-11.

76. On September 22, 1997, Doug Johnson, NRLC Legislative Director, issued a memo to journalists and other interested

parties once again explaining how McCain-Feingold had been mischaracterized "as addressing 'the misuse of advertisements that advocate issues' or 'campaigns that skirt restrictions by promoting candidates . . . [a] major . . . abuse." Specifically, asking that journalists "not characterize communications that are regarded as core protected speech under the First Amendment as 'abuses.'" A true and accurate copy of that memo is attached hereto as Exhibit B-12.

77. As yet another attempt to educate the press and public regarding campaign finance reform, on September 6, 1997, NRLC issued a press release explaining how the U.S. Supreme Court had refused to review a First Circuit ruling that struck down a set of speech-restrictive [15 (8 PCS/MC 276)] regulations issued by the FEC that were similar to those found in the McCain-Feingold bill. A true and accurate copy of that press release is attached hereto as Exhibit B-13.

78. On October 21, 1997, NRLC issued several radio ads mentioning the names of candidates who had endorsed the McCain-Feingold bill and demonstrating the effect of that endorsement on political speech. True and accurate copies of ads mentioning the names of Rep. Zach Wamp and Rep. Charlie Stenholm are attached hereto as Exhibits B-14 and B-15 respectively.

79. I believe that the effectiveness of the above ads can be demonstrated by an article written by Amy Keller in the Thursday, October 23, 1997, issue of Roll Call titled "National Right to Life Airs Radio Spots Blasting Two Members on Campaign Reform." Just the fact that the article was written shows, in my opinion, that the ads were successful in bringing attention to the problems of McCain-Feingold. A true and accurate copy of that article is attached hereto as Exhibit B-16.

80. On November 1 and 3, 1997, ads similar to those run regarding Reps. Wamp and Stenholm were run regarding Rep.

Chris Shays and Sen. Russ Feingold. Again these ads were intended to demonstrate the devastating effects of McCain-Feingold and Shays-Meehan on the political speech of citizens and citizen groups. True and accurate copies of the scripts of the ads mentioning Rep. Shays and Sen. Feingold are attached hereto as Exhibits B-17, B-19 and B-18 respectively.

81. On November 3, 1997, NRLC issued a press release describing its radio spots that were being run in Kentucky criticizing Rep. Scotty Baesler (D-Lexington) "for his authorship of [16 (8 PCS/MC 277)] a bill (HR 1366) that would severely restrict the right of citizens' groups to disseminate information on the voting records or positions of specific politicians." True and accurate copies of both the press release and the ads mentioning the name of Rep. Scotty Baesler are attached hereto as Exhibit B-21.

82. Also on November 3, 1997, NRLC issued a similar press release regarding ads being run in Wisconsin criticizing Sen. Russ Feingold (D-WI). True and Accurate copies of both the press release and the ads mention the name of Sen. Feingold are attached hereto as Exhibits B-22 and B-23 respectively.

83. On November 7, 1997, NRLC issued yet another press release regarding an incumbent's position on McCain-Feingold. Specifically, this press release highlighted the ads being run against Sen. McCain (R-AZ) in Arizona, Iowa and New Hampshire. True and accurate copies of the press release and the ads which began running on November 6, 1997, are attached hereto as Exhibit B-24.

84. On November 18, 1997, NRLC and Arkansas Right to Life jointly issued a press release criticizing Rep. Asa Hutchinson's "authorship of a bill to regulate ads by citizen groups if they mention the name of a member of Congress." True and accurate copies of both the press release and the ads are attached hereto as Exhibit B-25.

85. Attached hereto, as Exhibit B-26, are true and accurate copies of correspondence between NRLC and Sen. John McCain. Said letters were intended to demonstrate the restrictive nature of McCain-Feingold to one of its key authors and proponents. [17 (8 PCS/MC 278)]

86. In February 1998, NRLC continued to run issue ads criticizing Sen. Feingold and Sen. McCain for their sponsorship of McCain-Feingold. Further, NRL-PAC, in conjunction with South Carolina Citizens for Life Pac issued an ad expressly advocating the defeat of Sen. McCain in the primary to be held February 19, 2002. True and accurate copies of the press release and the ads are attached hereto as Exhibit B-27.

87. On March 5, 1998, NRLC issued "An Open Letter from the National Right to Life Committee to the Nation's Roman Catholic Bishops" in response to a letter from Senator McCain criticizing NRLC for opposing his "campaign reform" bill." The purpose of the letter was to explain why NRLC is vigorously opposed to the legislation. A true and accurate copy of that letter is attached hereto as Exhibit B-28.

88. On Wednesday, October 21, 1998, NRLC issued a press release regarding its Scorecard for the 1997-98 Congress. "The 12-page publication, 'Congress Roll Call Votes on Abortion and other Right-to-Life Issues During 1997 and 1998,' provides detailed and reliable information on the positions of all current members of Congress on major public policy issues relating to abortion, assisted suicide, and euthanasia" and gives each lawmaker "a score reflecting how often he voted in agreement with the positions taken by NRLC." A true and accurate copy of that press release is attached hereto as Exhibit B-29.

89. On October 26, 1998, NRLC issued a press release highlighting NRL-PAC's launch of radio ads "criticizing 'reformer' Baesler for his hypocritical silence as New York fat cat spends $400,000+ on pro-Baesler TV attack ads." True and

accurate copies of the press release, supporting documentation, and the ad are attached hereto as Exhibit B-30. [18 (8 PCS/MC 279)]

90. On October 29, 1998, NRLC issued a press release regarding NRL-PAC's ads exhorting votes for Ruddy Izzard over incumbent Charles Stenholm "for his promotion of legislation to restrict commentary on politicians by private advocacy groups such as Right to Life groups." True and accurate copies of both the press release and ad are attached hereto as Exhibit B-31.

91. Attached at Exhibit B-32 is a true and accurate copy of a press release issued by Sen. McCain on January 10, 2000, regarding NRL-PAC's ads against him. I believe that Sen. McCain's response shows that NRL-PAC's ads are effective or he wouldn't bother to refute them so publicly.

92. South Carolina and National Right to Life issued a joint press release regarding their PAC's "joint sponsorship of a 'substantial' week-long radio ad buy" urging "listeners who want 'a strongly pro-life president' not to vote for McCain." True and accurate copies of the press release and ads are attached hereto as Exhibit B-33.

93. On January 12, 2000, South Carolina Citizens for Life PAC and NRL-PAC issued a joint press release refuting the claims raised by McCain in his January 10, 2000, press release. The joint press release points out the inaccuracies in McCain's press release. A true and accurate copy of that press release is attached hereto as Exhibit B-34.

94. Attached as Exhibit B-35, is a true and accurate copy of a press release issued on January 10, 2000 by NRLC regarding Virginia Society for Human Life's victory over the FEC in a case challenging an FEC rule that expanded the definition of "express advocacy" to include "issue advocacy." [19 (8 PCS/MC 280)]

95. Attached as Exhibit B-36 are true and accurate copies of a press release issued on January 19, 2000, regarding an ad

issued jointly by NRLC and New Hampshire Citizens for Life and an ad issued jointly by NRL-PAC and NHCL-PAC. The press release includes the text of the two ads and explains that the ad that specifically says "vote for somebody else" is express advocacy, paid for by the PACs, but that the other ad is issue advocacy because it does not expressly exhort the hearer to "vote for or against" any candidate. Further, true and accurate copies of the documentation supporting the claims in both the ads and the press release is included.

96. Attached, as Exhibit B-37, is a true and accurate copy a press release, issued February 16, 2000, by South Carolina Citizens for Life and National Right to Life regarding their PAC's joint "radio ad highlighting reasons why pro-life citizens should support Governor George Bush over Senator John McCain in Saturday's primary" and a true and accurate copy of the ad itself is attached as Exhibit B-38.

97. On Wednesday February 9, 2000, National Right to Life and South Carolina Citizens for Life issued a joint press release announcing their endorsement of George W. Bush for President. They also announced that their PACs "are launching new radio ads throughout South Carolina, urging pro-life voters to oppose John McCain and vote for George Bush." A true and accurate copy of that press release, ad, and supporting documentation are attached hereto as Exhibit B-39.

98. On July 11, 2001, NRLC sent a letter to members of Congress urging them to vote for the Ney-Wynn Substitute because the Manager's Amendment sent by Reps. Shays and [20 (8 PCS/MC 281)] Meehan would not solve the grave threats posed by the original bill. Specifically, NRLC and other similar citizens' advocacy groups and "member[s] of Congress could be deemed to have engaged in illegal 'coordinated' activity, for example, if the group distributed printed literature publicizing the results of a candidate questionnaire or "pledge" on one or more

issues." A true and accurate copy of said letter is attached hereto as Exhibit B-41.

99. On July 22, 2001, NRLC Legislative Director Douglas Johnson, on behalf of NRLC, sent a letter to members of Congress reiterating NRLC's strong opposition to "the Shays-Meehan bill (H.R. 2356) because of multiple provisions that would greatly impair the rights of NRLC and its affiliates to effectively inform the public about legislative events in Congress, and would place both such organizations and members of Congress at legal risk for engaging in constitutionally protected communications regarding public policy issues. The letter specifically asks members of Congress not to sign a discharge petition that would force the bill to the House Floor. A true and accurate copy of said letter is attached hereto as Exhibit B-42.

100. As a part of NRLC's goal of discouraging the passage of McCain-Feingold, I wrote an article called "Silencing America." That article explains in detail the U.S. Supreme Court's protection of "issue advocacy" and regulation of "express advocacy." It then goes on to explain the policy problems with passing the BCRA, the problem with the "two-pronged" attack that the broadened definitions of "contribution" and "coordination" cause by making independent express advocacy expenditures extremely difficult if not impossible to do, and the problem with defining "express advocacy" as any communication containing the name or likeness of a [21 (8 PCS/MC 282)] candidate within 30 days of a primary or 60 days of a general election, among others. A true and accurate copy of that article is attached hereto as Exhibit B-43.

101. Attached hereto, as Exhibit B-44, is a true and accurate copy of a brochure put out by West Virginians for Life, Inc., explaining the problems with so-called campaign reform. This brochure accurately reflects the problems that NRLC has with campaign reform.

102. Because President Clinton's health care plan would essentially require that abortion on demand be provided by insurance companies as part of the basic benefits package, NRLC decided to educate the public and others regarding the damage Clinton's plan would do to the pro-life cause.

103. In June of 1993, NRLC ran an ad in Roll Call asking Congress not to approve tax-funded abortion on demand by repealing the Hyde Amendment. A true and accurate copy of that ad is attached hereto as Exhibit C-1.

104. Attached hereto, as Exhibit C-2, is a true and accurate copy of an ad ran in the September 20, 1993, issue of Roll Call condemning Clinton's health care plan because of its provision including universal insurance coverage for abortion.

105. As a part of NRLC's continuing efforts to educate the public and Congress about the dangers of the Clinton Health Care plan, NRLC produced an ad asking "Should federal law force every working American . . . every employer . . . every state government . . . to pay for abortion on demand?" A true and accurate copy of said ad is attached hereto, as Exhibit C-3.

106. On August 4, 1994, NRLC ran an ad in Roll Call explaining how "the abortion 'opt-out compromise' is a stealth plan for federally funded, federally mandated abortion services. [22 (8 PCS/MC 283)] Specifically, even with the opt-out plan (a) "employers would be forced to pay for abortion on demand," (b) clinics which do not currently have abortion providers would be forced to do so because of the mandate that "federally guaranteed services, including abortion, be uniformly available across the nation," (c) the "proposed Medicare Part C Trust Fund and other federally subsidized health plans would extend tax funded abortion to over 40% of the population," and (d) the bill "would pre-empt state restrictions on federally guaranteed benefits" such as "parental consent laws, waiting periods, and limits on third-

trimester abortions." A true and accurate copy of said ad is attached hereto as Exhibit C-4.

107. Also in 1994, NRLC, published an ad called "What is the Abortion Mandate?" This ad, while explaining the mandates in the Clinton Health Security Act, i.e. the requirement that "every local health plan provide and pay for 'medically necessary or appropriate' abortions," explains that according to recent polls a majority of Americans oppose the abortion mandate. This ad was published in the National Catholic Register on June 28, 1994. True and accurate copies of this ad is attached hereto as Exhibit C-5 and Exhibit C-12.

108. Because of NRLC's dedication to preserving the right to life of all people, NRLC also ran ads explaining that Clinton's Medicare Plan would result in a rationing of care "which may someday prevent you or a loved one from receiving life-saving medical treatment" and make "it illegal for Americans over 65 to supplement government Medicare payments with their own money in order to get unrationed, unmanaged, fee-for-service health insurance to protect their own lives and health." Attached hereto, as Exhibit C-6, is a true and accurate copy of said ad. [23 (8 PCS/MC 284)]

109. NRLC also published ads called "When Bill Clinton says 'Health care for all' . . . he's forgetting someone" to educate the public about the problems with the Clinton health care plan and encourage citizens to get involved by sending messages to their Senators and Representatives telling them that they do not want to be forced to pay for abortion and are against health care rationing. Said ad is attached hereto as Exhibit C-7.

110. NRLC also produced a video called "Condemned to Rationing: The Clinton Medicare Plan." The purpose of this video was to show the negative impact that Clinton's Medicare Plan would have on our older citizens. True and accurate copies of the "final script," dated November 8, 1996, and the "script," dated

January 22, 1997, are attached hereto as Exhibits C-8 and C-9 respectively.

111. As a part of its campaign to educate the public and Congress regarding the Clinton-Gephardt and Clinton-Mitchell bills, NRLC published an ad called "Abortion as a Federally Mandated Benefit: It's Not the Status Quo!" This ad urges members of Congress to vote for the Hall-Hyde-Kaptur Amendment. A true and accurate copy of the ad is attached hereto as Exhibit C-11.

112. NRLC also ran an ad called "Your Tax Dollars at Work . . . If the Clintons Have Their Way" and depicting a check to the abortion industry in the amount of seven hundred forty-two million dollars ($742,000,000) representing 1.6 million abortions. This ad was intended to educate the public about the amount of money that American taxpayers would pay to fund abortions under the Clinton plan. A true and accurate copy of this ad is attached hereto as Exhibit C-13. [24 (8 PCS/MC 285)]

113. Further, NRLC produced an ad explaining how the Clinton Plan would create rationing by "plac[ing] strict price controls on insurance premiums, forcing private insurers to ration to cover costs" resulting in a "law that would prevent you and your family from obtaining adequate coverage." This ad, called "Clinton's Rationing Plan would deny lifesaving health care to these vulnerable people" and showing pictures of a pre-mature baby and an older gentleman explains how health care rationing in Europe "has come at the expense of the young, people with disabilities and older people." A true and accurate copy of this ad is attached hereto as Exhibit C-14.

114. NRLC also supports the Unborn Victims of Violence Act (H.R. 503, S. 480) "which would recognize unborn children as victims under 68 federal laws dealing with crimes of violence."

115. As a part of educating the public and Congress regarding its stance on the act, NRLC published ads urging Congress to

pass the Unborn Victims of Violence Act (H.R. 503, S. 480) without the Lofgren "one-victim" substitute. The ads featured the stories of Shiwona Pace and Tracy Scheid Marciniak and were run on April 23, 2001, and May 24, 2001. True and accurate copies of those ads are attached hereto as Exhibits D-1 and D-2 respectively.

116. NRLC also carries information regarding the Unborn Victims of Violence Act on its website. Attached hereto, as Exhibit D-3, are true and accurate hard copies of information that was on our site as of May 8, 2001, regarding that act.

117. Just as we have with other issues, NRLC has encouraged citizens to contact their Senators and ask them to vote for the Unborn Victims of Violence Act, through a hotline, [25 (8 PCS/MC 286)] utilizing pre-written messages from Western Union. True and accurate copies of the Western Union mailgrams are attached hereto as Exhibit D-4.

118. A true and accurate copy of the thank you letter sent to people who arranged to send telegrams to their U.S. Senators in support of the Unborn Victims of Violence Act is attached hereto as Exhibit D-6.

119. As a part of its ongoing efforts to encourage citizens to get involved by lobbying their Senators, NRLC sent letters to pastors in June 2001, educating them on the need for and encouraging them to engage their congregation in supporting the Unborn Victims of Violence Act. A true and accurate copy of this letter is attached hereto as Exhibit D-5.

120. Attached hereto as Exhibit E-1, is a true and accurate copy of a document entitled "85% of Voters Say YES to the Ros-Lehtinen/Abraham Child Custody Protection Act." This document shows the public support behind the Child Custody Protection Act and NRLC's support of the Child Custody Protection Act.

121. NRLC produced a series of communications concerning the issue of cloning and stating their position on the topic.

122. Attached hereto as Exhibit F-1, is a true and accurate copy of a document entitled "Legislative Alert – Via Fax Broadcast Where Possible," dated May 13, 1992.

123. This document is a fax which describes H.R. 2507 and the federal funding of fetal tissue transplants. The fax explains that NRLC co-sponsored ads on the issue in *Roll Call* and the faxed materials should be used in lobbying activities. It also includes advertisements urging [26 (8 PCS/MC 287)] Congress to vote no on H.R. 2507 along with a letter to members of Congress regarding H.R. 2507.

124. Attached hereto as Exhibit F-2, is a true and accurate copy of the March 1996 issue of "Life Cycles" produced by NRL-ETF.

125. This document explains ethical standards associated with fetal tissue transplants and live human embryo research. Further, it explains ethical problems associated with such issues by citing examples. Also included is a report from Paul Ranalli, M.D. concerning Fetal Tissue Transplants: Failure or Success. In addition, it contains an article from Christopher Currie on "Hopes of the ill should not rely on abortion-dependent research." Another report is issued by Richard Doerflinger, entitled "The Human Embryo Research Panel: Creating Life to Destroy It." The last article is "Human Embryos Research Sources?" by Joseph J. Piccione, J.D.

126. Attached hereto as Exhibit F-3, is a true and accurate copy of a document entitled "Facts About Frozen Embryos and the Adoption Alternative," dated July 17, 2001, produced by NRLC.

127. This document describes the myths and realties of frozen embryos through a series of Newspaper quotes and cited studies.

128. Attached hereto as Exhibit F-4, is a true and accurate copy of a document entitled "Take Action Now on the Unborn Victims of Violence Act," dated June 24, 2001 and produced by NRLC.

129. This document is a congressional alert about the Weldon-Stupak Bill to ban cloning of human embryos. The alert mentions Representative Dave Weldon, Representative Bart [27 (8 PCS/MC 288)] Stupak and Representative Jim Greenwood. It also urges citizens to contact their House representatives to vote for Weldon-Stupak.

130. Attached hereto as Exhibit F-5, is a true and accurate copy of a document entitled "Americans to Let Congress Know How They Feel About Stem Cell Research That Would Require the Destruction of Human Embryos," dated August 15, 2001 and produced by NRLC.

131. This communication includes a press release about NRLC's efforts to have Americans telegram their representatives about their opposition to stem cell research. It also includes a generic letter to the editor stating NRLC's opposition to stem cell research and provides information about their telegram program. Lastly, it includes an advertisement concerning human embryos and the telegram program sponsored by NRLC.

132. Attached hereto as Exhibit F-6, is a true and accurate copy of a document entitled "National Right to Life Launches New Radio Ads in Eight States, Urging Calls to Senators in Support of Brownback-Landrieu Bill to Ban All Human cloning and Human Embryo Farms," dated April 19, 2002, produced by NRLC.

133. This communication is a press release concerning radio advertisements created by NRLC about support for the Brownback-Landrieu bill, S. 1899, to ban cloning of human embryos. It also includes scripts of such advertisements in Arkansas, Georgia, Indiana, Iowa, Missouri, North Dakota, Rhode Island and South Dakota.

134. Attached hereto as Exhibit F-7, is a true and accurate copy of a document entitled "NRLC Congressional Alert: Cloning," dated 5/9/2002 and produced by NRLC. [28 (8 PCS/MC 289)]

135. This communication is an e-mail from NRLC regarding the U.S. Senate voting on whether to ban the cloning of human embryos. The e-mail urges citizens to phone, fax, or e-mail offices of Senators about the bill. The e-mail explicitly references the names of several U.S. Senators.

136. Attached hereto as Exhibit F-9, is a true and accurate copy of a document entitled "New Right to Life Radio Ad Slams Senators Johnson and Daschle for Blocking Bill, Backed by President Bush, to Ban Human Embryo Cloning," dated May 9, 2002, and produced by NRLC.

137. This communication includes a press release describing an NRLC advertisement titled "Does Tim Johnson Favor Harvesting Human Clones?" The press release describes the advertisement's criticism of Johnson and his co-sponsorship of S. 2076. The communication also includes a script of the advertisement.

138. Attached hereto as Exhibit F-11, is a true and accurate copy of a document entitled "You can help NRLC's 'No Human Embryo Farms' Ad Campaign!'" and produced by NRLC.

139. This communication is a copy of a NRLC web page asking supporters to donate money for this advertising campaign.

140. NRLC produced a series of documents and a legislative alert that described their position against the Freedom of Choice Act ("FOCA"). Each communication describes the ill-effects of FOCA while some include clear references to candidates for federal office.

141. Attached hereto as Exhibit G-1, is a true and accurate copy of a document entitled "National Right to Life Legislative Alert: Congress to Vote on Whether to Ban All Abortion Limits," dated June 25, 2002. [29 (8 PCS/MC 290)]

142. This legislative alert urges citizens to contact their Congressmen and Senators to oppose the FOCA. It also analyzes the bill along with comments from its major supporters. The alert mentions the names of presidential candidates George Bush, H. Ross Perot and Bill Clinton. It also mentions Congressman Don Edwards, Senator Edward Kennedy, Attorney General William P. Barr and Congressman Henry J. Hyde.

143. Attached hereto as Exhibit G-2, is a true and accurate copy of a document entitled "ABORTION: Will Congress Be Driven To EXTREMES?"

144. This document presents NRLC's opposition to FOCA and analyzes its effect, advocating for the defeat of FOCA.

145. Attached hereto as Exhibit G-3, is a true and accurate copy of a document entitled "The 'Freedom of Choice Act' . . . It Will Hit You Close to Home."

146. This document, produced by NRLC, explains the effect of the FOCA on the abortion laws of various states and urges the defeat of this legislation.

147. Attached hereto as Exhibit G-4, is a true and accurate copy of a document entitled "The 'Freedom of Choice Act' . . . It Will Hit You Close to Home", dated May 26-27, 1993.

148. This advertisement, produced by NRLC, was run in three publications circulated on Capitol Hill and it explains the effect of the FOCA on the abortion laws of various states and urges the defeat of this legislation.

149. Attached hereto as Exhibit G-5, is a true and accurate copy of a document entitled "ABORTION: Will Congress Be Driven To EXTREMES?"

150. This document presents NRLC's opposition to FOCA and analyzes its effect, advocating the defeat of FOCA. [30 (8 PCS/MC 291)]

151. Attached hereto as Exhibit G-6, is a true and accurate copy of a document entitled "The Freedom of Choice Act: Will Congress Go To EXTREMES?"

152. This document presents NRLC's opposition to FOCA and analyzes its effect.

153. Attached hereto as Exhibit G-7, is a true and accurate copy of a document entitled "The 'Freedom of Choice Act' . . . Whom Would It Protect?"

154. This document, produced by NRLC, indicates that the FOCA would protect Dr. Abu Hayat, a doctor who was "sentenced to 1 to 4 years in prison" for violating New York abortion laws. The document mentions Congressman Canady and Congresswoman Ros-Lehtinen and discusses the Ros-Lehtinen Amendment.

155. Throughout its existence, NRLC has produced Scorecards regarding the United States Congress members and their votes on abortion related issues. The communications provide an overview of annual abortion issues addressed by Congress and explicitly refer to federal officeholders' names while indicating whether they voted pro-life or pro-abortion.

156. Attached hereto as Exhibit H-1, is a true and accurate copy of a document entitled "U.S. Congress Roll Call Votes on Abortion: 1991", dated December 31, 1991.

157. This document describes votes a variety of Congress' votes related to abortion. It also mentions all the names of then-present members of the United States House of Representatives and the United States Senate. The document includes a roll call vote chart indicating whether named representatives have voted pro-life or pro-abortion. [31 (8 PCS/MC 292)]

158. Attached hereto as Exhibit H-2, is a true and accurate copy of a document entitled "Complete 1992 House of Representatives Roll Call Votes Scored by National Right to Life Committee."

159. This document describes a variety of the House of Representatives votes related to abortion. The document includes a roll call vote chart indicating whether named representatives have voted pro-life or pro-abortion.

160. Attached hereto as Exhibit H-3, is a true and accurate copy of a document entitled "Senate Roll Call Votes Scored By National Right To Life Committee: 1992."

161. This document describes a variety of the Senate's votes related to abortion. The document includes a roll call vote chart indicating whether named senators have voted pro-life or pro-abortion.

162. Attached hereto as Exhibit H-4, is a true and accurate copy of a document entitled "National Right to Life Scorecard, U.S. House 1993 Key Roll Call Votes on Abortion," dated December 16, 1993.

163. This document describes a variety of the House of Representatives' votes related to abortion. The document includes a roll call vote chart indicating whether named representatives have voted pro-life or pro-abortion.

164. Attached hereto as Exhibit H-5, is a true and accurate copy of a document entitled "National Right to Life Scorecard, U.S. Senate 1993 Key Roll Call Votes on Abortion," dated December 16, 1993. [32 (8 PCS/MC 293)]

165. This document describes a variety of the Senate's votes related to abortion. The document includes a roll call vote chart indicating whether named senators have voted pro-life or pro-abortion.

166. Attached hereto as Exhibit H-6, is a true and accurate copy of a document entitled "U.S. House of Representatives Votes on Abortion 1995," dated May, 1996.

167. This document describes a variety of the House of Representatives' votes related to abortion. The document includes a roll call vote chart indicating whether named representatives have voted pro-life or pro-abortion.

168. Attached hereto as Exhibit H-7, is a true and accurate copy of a document entitled "U.S. Senate Votes on Abortion 1995," dated May, 1996.

169. This document describes a variety of the Senate's votes related to abortion. The document includes a roll call vote chart indicating whether named senators have voted pro-life or pro-abortion.

170. Attached hereto as Exhibit H-8, is a true and accurate copy of a document entitled "NRLC-SCORED 1996 U.S. House Roll Call Votes," dated 10/9/96.

171. This document describes a variety of the House of Representatives' votes related to abortion. The document includes a roll call vote chart indicating whether named representatives have voted pro-life or pro-abortion.

172. Attached hereto as Exhibit H-9, is a true and accurate copy of a document entitled "NRLC-Scored 1996 Senate Roll Call Votes," dated 4/25/97. [33 (8 PCS/MC 294)]

173. This document describes a variety of the Senate's votes related to abortion. The document includes a roll call vote chart indicating whether named senators have voted pro-life or pro-abortion.

174. Attached hereto as Exhibit H-10, is a true and accurate copy of a document entitled "U.S. Congress Roll Call Votes on Abortion and Other Right-to-Life Issues During 1997 and 1998," dated October 1998.

175. This document describes a variety of the Congress' votes related to abortion. The document includes a roll call vote chart indicating whether named representatives have voted pro-life or pro-abortion.

176. Attached hereto as Exhibit H-11, is a true and accurate copy of a document entitled "U.S. Congress 1999 Roll Call Votes on Abortion and Other Right-to-Life Issues," dated January 2000.

177. This document describes a variety of the Congress' votes related to abortion. The document includes a roll call vote chart indicating whether named representatives have voted pro-life or pro-abortion.

178. Attached hereto as Exhibit H-12, is a true and accurate copy of a document entitled "National Right to Life Scorecard on Abortion and Other Right-to-Life Issues, U.S. House of Representatives 1999-2000," dated October 12, 2000.

179. This document describes a variety of the House of Representatives' votes related to abortion. The document includes a roll call vote chart indicating whether named representatives have voted pro-life or pro-abortion. [34 (8 PCS/MC 295)]

180. Attached hereto as Exhibit H-13, is a true and accurate copy of a document entitled "Senate Gives Final Approval to 'Clinic Access' Bill," dated May 24, 1994.

181. This document describes the "Clinic Access" bill and lists a roll call vote chart indicating whether named senators have voted pro-life or pro-abortion.

182. Attached hereto as Exhibit H-14, is a true and accurate copy of a document entitled "House Gives Final Approval to 'Clinic Access' Bill," dated May 24, 1994.

183. This document describes the "Clinic Access" bill and lists a roll call vote chart indicating whether named representatives have voted pro-life or pro-abortion.

184. In 1988, several candidates or their counsel wrote letters to radio stations regarding the broadcast of advertisements concerning candidates by independent political action committees.

185. Attached hereto as Exhibit I-1, is a true and accurate copy of a document entitled "Bob Kerrey For United States Senate," dated October 11, 1988.

186. This document is a letter from Bill Hoppner, Chairman, Kerrey for U.S. Senate, explaining that certain political advertisements ran by independent political action committees are "personal attacks." It goes on to explain that stations are not obligated to run such advertisements and states that such stations are not immune from liability if they broadcast "libelous attacks." Lastly, it explains the obligation stations have in affording affected candidates notice of such attacks and a "free opportunity to respond" to such attacks.

187. Attached hereto as Exhibit I-2, is a true and accurate copy of a document entitled "Station Manager," dated October 21, 1988. [35 (8 PCS/MC 296)]

188. This document is a letter from Robert F. Bauer, Counsel for the Democratic Senatorial Campaign Committee. It is a generic letter explaining that certain political advertisements ran by independent political action committees are "derogatory attacks." It goes on to explain that stations are not obligated to run such advertisements and states that such stations are not immune from liability if they broadcast "libelous attacks." Lastly, it explains the obligation stations have in affording affected candidates notice of such attacks and a "free opportunity to respond" to such attacks.

189. Attached hereto as Exhibit I-3, is a true and accurate copy of a document entitled "Jeffrey L. Eskin," dated October 28, 1998.

190. This document is a letter on behalf of "Friends of Bryan," Richard Bryan's authorized Campaign Committee for election to the United States Senate. The letter demands response time on behalf of Friends of Bryan to respond to advertisements aired by "the Auto Dealers." Attached hereto as Exhibit I-4, is a true and accurate copy of a document entitled "Jeffrey L. Eskin," dated October 28, 1998.

191. This document is a letter on behalf of "Friends of Bryan," Richard Bryan's authorized Campaign Committee for election to the United States Senate. The letter objects to the station running American Medical Association Political Action Committee advertisements and asks the station to cancel such advertisements. It goes on to note that the advertisements violate the Federal Election Campaign Act of 1971 as the author believes the advertisements are not independent. [36 (8 PCS/MC 297)]

192. Attached hereto as Exhibit I-5, is a true and accurate copy of a document entitled "Perkins Coie" dated October 31, 1998.

193. This document is a letter to a station manager from Robert F. Bauer, Counsel, Burdick Campaign Committee, Inc. It explains that certain political advertisements ran by independent political action committees are "derogatory attacks." It goes on to explain that stations are not obligated to run such advertisements and states that such stations are not immune from liability if they broadcast "libelous attacks." Lastly, it explains the obligation stations have in affording affected candidates notice of such attacks and a "free opportunity to respond" to such attacks.

194. Attached hereto as Exhibit I-6, is a true and accurate copy of a document entitled "Dear Station Manager:" dated October 31, 1998.

195. This document is a letter from Jeffrey L. Eskin regarding independent organizations and their "negative commercials"

aired against Governor Richard Bryan. The letter sets forth the station's general obligations under the law with regard to the airing of such advertisements. In the letter, Mr. Eskin asks the station to review National Right to Life's advertisements concerning Governor Bryan's abortion position and to refuse the broadcast of such advertisements.

196. Attached hereto as Exhibit I-7, is a true and accurate copy of a document entitled "Fax Transmission Sheet, Friends for Bryan," dated 10/31/88.

197. This is a fax sent on behalf of "Friends for Bryan," the Bryan for U.S. Senate Campaign, to "KOH News." The fax urges radio stations to not air National Right to Life's [37 (8 PCS/MC 298)] advertisements concerning Senator Hecht's abortion funding position. The communication includes the name of Senate candidate Chic Hecht and refers to the Bryan for U.S. Senate campaign.

198. Attached hereto as Exhibit I-8, is a true and accurate copy of a document entitled "Fax Transmission Sheet, Friends for Bryan," dated 11/1/88.

199. The document is a fax from Jeff Eskin, on behalf of Friends for Bryan, to Ken Mendenhall. The letter informs the radio station of its legal obligations with regard to independent organizations running "negative commercials" against Governor Richard Bryan. It then asks the station to review one of National Right to Life's advertisements concerning Senator Hecht and his stance on abortion. Lastly, it urges the station to refuse to run these political advertisements of National Right to Life.

200. NRLC does not believe any of its activities corrupt or appear to corrupt any federal, state or local candidates or officeholders. NRLC and its members have various interests that are served through communications and other activities with its members and the general public, and these political activities are necessarily funded with money. Indeed, NRLC believes that its

activities, rather than creating an appearance of corruption, instill in the general public a sense of confidence that avenues for pursuing legitimate common interests are available to all. [38 (8 PCS/MC 299)]

I declare under penalty of perjury that the foregoing is true and correct. Executed on this date: October 4, 2002

/s/ David N. O'Steen
David N. O'Steen, Executive Director

[1 (8 PCS/MC 1)]

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Senator Mitch McConnell, *et al.*,	)	
Plaintiffs,	)	Case No. 02-0582
v.	)	(CKK, KLH, RJL)
	)	*All consolidated*
Federal Election Commission, *et. al.*,	)	*cases.*
Defendants.	)	

Declaration of
U.S. Representative Mike Pence

I, Michael R. Pence, declare the following on personal knowledge or on information and belief where noted:

1. I am the Representative to the Congress of the United States of America from the Second Congressional District of the State of Indiana.

2. I was first elected to this office in A.D. 2000 and am currently a candidate for reelection.

3. In the House of Representatives, I am the Assistant Majority Whip, Chairman of the Small Business Subcommittee on Regulatory Reform and Oversight, and serve on the Judiciary and Agriculture Committees.

4. I am a United States citizen, member of Congress, candidate, voter, recipient, fundraiser, and party member, and have been, and will continue to be, injured by the Bipartisan Campaign Reform Act of 2002 ("BCRA") in each of these capacities.

5. I have a longstanding relationship with Plaintiff Indiana Family Institute, Inc. ("IFI") dating back at least ten years. The purpose of IFI is to focus attention on public issues related to [2 (8 PCS/MC 2)] traditional family values, a view with which I essentially agree. Because we agree with IFI, I and my wife have

both served on its Board of Advisors, we have supported it financially, and I continue to be a featured guest and speaker at IFI events, including fundraising events. My wife and I consider it important to support organizations such as IFI that work to see that pro-family issues are considered in state public policy debates. I plan to continue this activity in the future with respect to both IFI and other nonprofit, expressive corporations whose efforts likewise influence state and local government.

6. The BCRA chills my free speech and association rights by inhibiting my ability to assist IFI and other nonprofit (under 501(c) of the Internal Revenue Code), incorporated, expressive associations in raising funds to advance pro-family issues in state public policy debates. I have so exercised my free speech and association rights and intend to continue, but for the chill imposed by the BCRA.

7. On information and belief, IFI is recognized as a 501(c)(3) organization by the IRS. *See Declaration of Curt Smith*. Appended as *Exhibit A* is an IFI fundraising letter noting that, in the wake of a slowed economy and the September 11 terrorist attack, giving to nonprofits was down and that giving to IFI had declined by thirty percent. The IFI letter encouraged recipients to join IFI's Leadership Council by contributing one thousand dollars, noting that donors would have the opportunity to meet with me at a private briefing:

> As a member of the Leadership Council, you will receive . . . regular private briefings with national and state newsmakers and policy leaders. **The Council will host Congressman Mike Pence in the near future, we anticipate (though it is not yet confirmed) holding a special Leadership Council event with Special Prosecutor Ken Starr in 2002, and a key White House official has also agreed to schedule a briefing for IFI's Leadership Council.** I ask you to join this key group today. [emphasis in original]

[3 (8 PCS/MC 3)]

8. IFI also does fundraising dinners, which charge a per-plate fundraising charge and feature a noteworthy speaker from the pro-family movement. Additional solicitations are commonly made at such events. I have attended such events, encouraged others to attend, and anticipate being asked to be a speaker or featured guest at such events.

9. Another example of my participation in a fundraising event for a nonprofit, expressive corporation was my keynote speech at the annual fundraising banquet of Vanderburgh County Right to Life (Indiana) on April 22, 2002. On information and belief, VCRTL is recognized as a 501(c)(4) organization by the IRS, and this annual banquet is the major annual fundraising event for the organization.

10. I participated in the events described with the understanding that they were fundraising events and with the intent of assisting these organizations in their efforts to raise funds. I did and do so because these organizations promote views that I personally hold as well.

11. At the Vanderburgh County Right to Life fundraising banquet, I emphasized the "unalienable Right[]" of "Life" of the *Declaration of Independence* and concluded by exhorting the audience of over 2000 listeners to "defend the right of life," knowing that immediately after that call to action the organization's Executive Director would rise to make a solicitation for contributions to the organization to assist it in its work.

12. Often the most effective way to raise funds for a nonprofit organization at fundraising events is to have the featured speaker actually make the express solicitation for money at the close of the speech, as opposed to having another individual come to the lectern and make the solicitation. I want to be able to

use both approaches in the raising of funds for organizations whose views I support, and I intend to do so in the future. [4 (8 PCS/MC 4)]

13. Such fundraising events as are described above commonly include a presentation on the past or planned activities of the organization, either as an oral presentation (often with audio-visual enhancement) or in printed form (such as in a booklet) to show what potential donors are supporting by their past and anticipated contributions.

14. Depending on the expressive association, the activities described in the presentation often include (a) public communications (such as grassroots lobbying, issue advertising, and voter guides) that refer to a clearly identified candidate for federal office near election time and could be perceived as "promot[ing] or oppos[ing]" or "attack[ing] or oppos[ing] (unconstitutionally vague terms) a candidate for that office (because of his or her position on issues); (b) voter registration within 120 days of a federal election that ends at the election, voter identification in connection with a federal election, and get-out-the-vote activity in connection with a federal election. Vanderburgh County Right to Life is a corporation that engages in a wide range of these activities with respect to federal, state, and local elections. IFI engages in some of these activities and has asserted its intent to continue doing so and to expand into doing more of these activities. *See Declaration of Curt Smith.*

15. Some expressive associations that are incorporated also engage in independent expenditures in connection with federal candidates, with or without a connected political action committee ("PAC"), and some make contributions through their PACs to federal candidates.

16. My advocacy to audiences to support an organization where I am asked to be a speaker at a fundraising event may readily be considered by listeners to be a solicitation for funds

that will or should be spent to support the sorts of activities described in the presentation of past and planned activities at the fundraising event, even if the language of this solicitation is expressed in general terms and does not specify how the funds will or should be spent. [5 (8 PCS/MC 5)]

17. It is unclear to me whether the "principal purpose" of an expressive association such as IFI or Vanderburgh County Right to Life is to engage in voter registration, voter identification, and get out the vote activity because "principal purpose" is undefined by the BCRA, the statute is unclear as to whether such activity must be *a* principal purpose or *the* principal purpose, and it unclear whether "principal purpose" means the same as "major purpose," the legal term of art used by the United States Supreme Court in *FEC v. Massachusetts Citizens for Life*, 479 U.S. 238 (1976) ("*MCFL*").

18. As a result of the unclarity of the phrase "principal purpose," many of the expressive associations for which I have raised, and intend to continue raising, funds may be considered to have a principal purpose of engaging in voter registration, voter identification, and get out the vote activity, regardless of whether this is actually the case.

19. As to expressly soliciting funds for voter registration, voter identification, and get out the vote activity, or for soliciting contributions to an expressive association that can be determined to have such activity as a "major purpose," the BCRA limits me to making such a solicitation "only to individuals" and requires that "the amount solicited from any individual during any calendar year does not exceed $20,000."

20. There is no compelling governmental interest to so limit my free speech and association rights concerning solicitations for contributions to expressive association corporations, and receipt of de minimis business corporation contributions by expressive association corporations has already been held by the federal

courts to not affect the status of the expressive association corporation as an MCFL-type organization as described by the Supreme Court in the *MCFL* case. [6 (8 PCS/MC 6)]

21. The requirement that "the amount solicited from any individual during any calendar year does not exceed $20,000" is by its terms a limitation on *solicitation*, not *contribution*, and unconstitutionally exposes me to liability for asking individuals for a $20,000 contribution when the individual has already been solicited for a contribution of any amount in that calendar year. This problem is exacerbated by the fact that my solicitations are typically done to groups, in which it is impossible who all is in the audience and what solicitations have been made already to individuals.

22. It is my intent to continue implicit and explicit solicitation of funds for IFI and other nonprofit, issue-advocacy groups that stand for causes in which I believe. However, the BCRA chills my free association and speech rights to engage in such solicitation, and unless these unconstitutional burdens of the BCRA are lifted, I will not engage in such solicitation. [7 (8 PCS/MC 7)]

I declare under penalty of perjury that the foregoing is true and correct. Executed on this date: September 26, 2002

/s/ Mike Pence
Mike Pence, Member of Congress

DECLARATION OF ROCKY PENNINGTON

[DEV 8, Tab 31]

1. My name is Rocky Pennington.

2. I am a Republican political consultant. I am the owner and President of three Florida companies engaged in political activities: Southern Campaign Resources, Direct Mail Systems, Inc., and Summit Communications. Southern Campaign Resources, which I founded in 1982, does general consulting primarily for Florida state campaigns, but we have also done Congressional races in Florida, including Congressman Cliff Steams' first race in 1988 in Ocala, Bill Sublette's 2000 campaign in the Eighth Congressional district, and Congressman Jeff Miller's 2001 special election in the Panhandle. Direct Mail Systems, founded in 1981, is a direct mail company with about 100 employees that has done fundraising and voter contact mail for candidates, parties and interest groups in Florida and elsewhere, including doing mail for some of Florida's Republican Congressional delegation, as well as for state Republican parties in many other states. Summit Communications, which I founded in 2000, creates political [2] advertising for television and radio and buys air time for various campaigns, such as Congressman Miller's 2001 general election campaign. From 1984 to 1986, I worked on federal and state campaigns in Florida, Wisconsin and Washington state. From 1980 to 1984, I served as Executive Director of the Republican Party of Florida. From 1978 to 1980, I was a legislative aide in the Florida state legislature. From 1976 to 1978, I worked for the Republican Party of Florida, starting as a field person for Gerald Ford's 1976 Presidential campaign and other races, and moving up to organizational director at the time I left. I started in politics as a volunteer in legislative races while attending Florida State University in 1974.

3. General consultants like me typically prepare political campaign plans, then work with campaigns on an

ongoing basis to make sure the plans are being executed as designed, which includes overseeing the efforts of the campaign manager, the media advisor and the polling advisor. Each general consultant may do these plans somewhat differently, but here is my basic approach. The campaign plan starts with a lot of research, including precinct targeting and in-depth analysis of the strengths and weaknesses of your candidate and your opponents, including primary opponents. You take an accountancy of these strengths and weaknesses, and look at what messages you want to get out about your candidate and your opponents, and what messages they are likely to want to get out about themselves and your candidate. You develop a campaign theme. Then you set up a series of strategic objectives for the campaign to try to reach in order to get to 50% plus one in the election, explaining in narrative form why you need each and how you're going to get there. Then you write a communications plan. This includes a detailed narrative of your broadcast and cable television and radio, what the commercials will say, when they'll go up, when they have to be written and produced by, and so on. The communications plan includes a direct mail plan, and may also include a telemarketing plan to [3] identify voters or push them one way or the other, and to make get-out-the-vote calls. The organizational section of the campaign plan includes all the grassroots activities, such as precinct walks, signs, and coffees. You develop a budget and a finance plan. Once the plan is complete, you go over it in great detail with the candidate and key advisors, modify it as needed, and try to follow it through election day.

4. An important element running through modern campaign plans is consideration of what role political parties and interest groups are going to play in your campaign. You write the plan thinking about which of these groups can help you and how they can do so most effectively. It's also very important to try to predict what groups are going to come in on the other side, because you have to figure out how to

counter what they're going to be doing. Sometimes in recent years candidates have become almost spectators in the process, as others have pretty much hijacked the campaigns.

5. Political parties are important in campaigns at the federal and state levels. In federal races, the national and state parties can both play key roles. Of course parties at both levels run ads to help the campaign, as will be discussed below, but they also help in other ways. The national and state parties work together to help campaigns through grass roots activities. In addition, parties and campaigns often rely on common research and share information. It makes little sense to have the party and the campaign working on the same thing, and so information is often traded back and forth. For example, in preparing to do a poll to test issues that might be used in advertising, research is involved, and relevant information is shared. This happened in Bill Sublette's 2000 campaign for Florida's Eighth Congressional district, in which Ric Keller ultimately won a run-off election against Mr. Sublette and then the general election against the Democratic candidate Linda Chapin. I recall discussing an issue that was ultimately used in ads [4] run by the National Republican Congressional Committee ("NRCC") against Ms. Chapin relating to the purchase of a bronze frog during the time she was Orange County Chairman. As I recall, in that situation information was shared between our campaign and the Florida Republican Party before a poll was done, and there was general agreement between the Party and our campaign about where Ms. Chapin was vulnerable. Of course, this kind of sharing also happens between federal campaigns and the national parties. In state and local races, the national committees are rarely involved to any great extent. Of course, the state parties are focused on state races and in Florida they sometimes spend a lot of money on those. In my experience, the county parties in Florida are not very involved financially in political campaigns.

6. Interest groups have played an increasingly large role in recent federal and state races. In Florida races, you have to think about a number of groups that may be involved, including the trial lawyers, the physicians, the home builders, the unions, the nursing home operators, and Associated Industries, which is the largest business association in Florida, representing mainly large Florida corporations.

7. Some interest groups do what amounts to a vetting process to decide if they will help a particular federal or state candidate. These groups often do a lot of screening before deciding to commit resources and take an active role. Many make the candidates fill out lengthy questionnaires, and then bring them in and essentially grill them in what is almost a Star Chamber atmosphere about their positions on specific issues. Some groups, such as Associated Industries, actually videotape the interview so they can have it to show the candidate if they're successful and the issue comes up in the legislature, to remind them of what their position should be. The groups have gotten pretty sophisticated and pretty aggressive about trying to pin down the elected officials on what their vote's going to be ahead of time. [5]

8. If an interest group does decide to assist your candidate, it's usually helpful in the campaign, and even more helpful if you have good communications with the group and can persuade them to do things that you feel are more productive. Interest groups can help in different ways. They can raise funds from their members, and in federal races this may take the form of raising federal funds ("hard money") and bundling the checks, then delivering them all together. They can also produce and run TV and radio ads, using hard money to do independent expenditures, or non-federal funds ("soft money") to run electioneering that avoids express advocacy. They can create direct mail plans and do mass or targeted mailings, and buy billboards and print ads. They can set up phone banks, or do push polling to create positive impressions of your candidate or negative

impressions of your opponent. Just before the election they can do get-out-the-vote calls to help your candidate, or vote suppression calls to tell voters something bad about your opponent. In addition to trying to elect candidates, these groups are often trying to create appreciation or even obligation on the part of successful candidates. And candidates usually do appreciate this kind of help, even when they deny it publicly, which they usually do.

9. Effective electioneering is crucial in political campaigns. Television, an emotion-based medium, is the most effective. Radio can also be effective, depending on the specific market you're trying to reach. For example, if you're in a Republican primary and want to reach Republican males between the ages of 18 and 45, Rush Limbaugh radio is probably a good buy. Direct mail can also be very effective, in a different way, since it is more of an information-based medium. You're reaching voters at different levels, and it's good to have a good mix. The above media are good for both candidate and third party communications in a campaign.

10. I am aware of the distinction between the so-called "magic words" of express advocacy and electioneering that avoids the magic words. Many soft money ads that avoid the [6] magic words are clearly intended to affect federal elections. Parties and interest groups would not spend hundreds of thousands of dollars to runs these ads 15 days before an election if they were not trying to affect the result. These candidate-specific ads are not usually run the year before the election or the week after. The usual final tag line for soft money electioneering is to "call" or "ask" or "tell" a candidate to stop or continue doing something, often something vague like fighting for the right priorities. This is pretty silly, because it's hard to imagine thousands of people calling the candidate in response to the ad and saying, keep doing this, this is wonderful. These standard final words, like "tell," have become the real "magic words" in modern

campaigning. I imagine some smart lawyer came up with them, because the real audience for them is not the voters, but the courts who may be examining the ad after the election.

11. Party and interest group attack ads can help a candidate in many ways. In addition to getting out a negative message about the opponent, they allow the candidate to conserve his limited resources and focus them on getting out a positive message about himself. At the same time, the candidate can disavow the negative ads, saying--with a wink--I didn't know anything about it and I condemn these things. I think this now happens in virtually every campaign. Very few politicians would stand up and say, I think it's great, keep it up. Of course, occasionally the approach these groups take is off base, and in those cases the ads may not be that helpful. But usually the ads are helpful and candidates appreciate them.

12. As noted above, I served as general consultant to Bill Sublette's 2000 campaign in Florida's Eighth Congressional district. We also did his direct mail. Mr. Sublette received more votes than Mr. Keller in the Republican primary in early September 2000, but not enough to avoid a run-off. In the run-off in early October 2000, Mr. Keller prevailed, and he went on to win the general election against Ms. Chapin. In my opinion, this race was a good example of a [7] situation where the candidates' campaigns became almost irrelevant, as parties and interest groups came to dominate the race. The role of the Club for Growth was pivotal. Early in the campaign, I remember Mr. Sublette coming back from a vetting meeting with the Club for Growth, indicating that he did not feel it had gone too well and that the group was talking about becoming very involved in the race. Shortly after that, we learned that Mr. Keller was making it known in Washington and Orlando that the Club for Growth was going to play a major role in his campaign, and to expose Mr.

Sublette's record on taxes and other issues. So the group was a cloud looming over our campaign from an early stage.

13. Political party and interest group broadcast "issue ads" played a key role in the 2000 race in Florida's Eighth Congressional district. I am aware that the national party committees often run electioneering ads through the state parties. In the 2000 race, the national Democratic party spent a great deal of money attacking Mr. Sublette with "issue ads" before the Republican primary, because they thought they could paint Mr. Keller as an extremist and defeat him in the general more easily than Mr. Sublette, a moderate Republican who could get Democratic and Independent cross-over votes. These party ads were a factor in Mr. Keller being able to force a run-off with Mr. Sublette. Storyboards representing two Florida Democratic Party ads that I understand were run just before the early October 2000 Republican run-off are attached as Exhibit 1 to this declaration. I understand that these storyboards and all others attached to this declaration were provided by the Brennan Center for Justice, which had obtained them by arrangement with the Campaign Media Analysis Group. Based on my observations, these ads were designed to make sure that Mr. Keller was the Republican nominee, especially the one attached at Exhibit 1 at 2 entitled "Sublette Sprawl," which is an entirely negative hit piece. [8]

14. The Republican national and state parties were also active against Ms. Chapin prior to the Eighth district Republican run-off in October 2000. These parties were trying to keep Ms. Chapin from building up a head of steam while Mr. Sublette and Mr. Keller were still duking it out in the primary and run-off. Storyboards representing two Florida Republican Party ads that I understand were run just before the Republican run-off are attached as Exhibit 2 to this declaration. The NRCC also ran ads against Ms. Chapin before the run-off. Storyboards representing two of these NRCC ads are attached as Exhibit 3 to this declaration. The

NRCC ad attached at Exhibit 3 at 1 ("FL/NRCC Chapin Spend and Tax"), focuses on the frog issue. As noted above, I had been involved with the state party in the research on which this ad was based. All of these ads were clearly intended to affect the election results.

15. Interest group broadcast ads had a very significant effect on the outcome of the 2000 Congressional race, especially the ads run by the Club for Growth. As noted above, the Club for Growth and Mr. Keller had made their relationship well known, and the Club for Growth ads clearly reflect an intent to help elect Mr. Keller. Storyboards representing two of these ads are attached as Exhibit 4 to this declaration. In my view, the ad entitled "Keller Sublette Higher Taxes," represented here at Exhibit 4-1, was a very, very effective one, and had it not run just before the primary, I believe Mr. Sublette would have reached 50% and there would have been no run-off. Our polling at that time indicated that we were in good shape, until the Club for Growth ads began. The other ad that is attached ran just before the run-off.

16. Other interest groups also ran ads trying to elect Mr. Keller in the Republican primary and the run-off. One ad run against Mr. Sublette that I thought probably cost us a couple points in the primary was a radio spot run, as I recall, primarily on conservative talk radio and maybe some Christian stations by Americans for Limited Terms. This ad attacked Mr. Sublette [9] on tax and other issues, basically calling him a big government liberal, while praising Mr. Keller as a real conservative. I also recall another business group running a broadcast ad attacking Mr. Sublette for not being conservative enough, though I can't remember which group it was.

17. Mr. Keller received benefits beyond the immediate messages these interest groups delivered on his behalf. The group ads allowed Mr. Keller to conserve his resources for a focused positive message about himself. Without the

intervention of these groups, there is no way he could have gotten out a negative message about Mr. Sublette, while still getting his own name I.D. up enough to be competitive. The groups took a major burden off his campaign, and based on my experience in situations like this, it is likely that his campaign knew what the interest groups were going to be doing and adjusted their campaign plan to account for it.

18. One group that did step in to try to support Mr. Sublette in the primary and runoff was the Republican Leadership Council ("RLC"), a moderate Republican group. Storyboards representing two ads RLC ran are attached as Exhibit 5 to this declaration. Although I was generally aware that the RLC was going to run ads against Mr. Keller, I had no knowledge of details as to the content or size of the ad buy. Our campaign plan was written without any anticipation of the RLC's involvement. As I understand it, these ads were funded primarily by the Florida sugar industry. Mr. Keller had worked in a law firm that was a leader in a ballot initiative that would have raised the price of sugar, and the sugar industry did not want him in Congress messing with their subsidies. Frankly, I did not think these ads were very effective, though as a consultant I was grateful that someone was pounding on Mr. Keller while the Club for Growth was pounding on Mr. Sublette.

19. I agree with the public statements I understand were made by Mr. Sublette, former Republican Member of Congress Joe Scarborough, and the Club for Growth itself, to the effect [10] that the Club for Growth was the reason Mr. Keller survived the primary and won the run-off in the 2000 Florida Eighth district Congressional race. The Club for Growth ran the powerful broadcast ads described above, and also bundled significant hard money contributions for Mr. Keller. Mr. Keller's success in this race was basically a product of the Club for Growth.

20. I support the goals of the new McCain-Feingold legislation. Based on my observations, the use of soft money

in federal elections has gotten out of hand. I say that even as someone who makes money from this system, because I am also a voting American. Money has taken over the system. The people who paid huge amounts during the 1996 election cycle in order to sleep in the Lincoln Bedroom at the White House wanted access. And I don't feel that is an appropriate way to spend corporate treasury funds, whether it takes the form of soft money donations or interest group electioneering. I think that in general companies should stay out of that kind of government process, and the government should stay out of the market. If a company like Enron can't survive without using money to affect government policy, it ought not to survive. That kind of activity is a distortion of the market.

21. I understand that the new McCain-Feingold legislation, in addition to the national party soft money ban, prevents federal candidates from raising soft money for state and local parties, and also prevents the state and local parties from using soft money transferred among themselves to affect federal elections. Based on my experience, without these additional limits I think it's a fairly good prediction that soft money would flow to the state and local parties and still be used to influence federal elections. [10]

22. Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct.

[PENNINGTON EXHIBIT 4-1]

CMR Ad Detector – CMAG Reports

BRAND: POL-CONGRESS+

TITLE: FL/Keller Sublette Higher Taxes

COMMERCIAL: FL/Keller Sublette Higher Taxes 1 of 1

LENGTH: 30

FRAMES: 4

[Frame 1 of 4]

[Woman1]: "I hear about how well the economy is doing, but my husband and I are working harder than ever. Taxes are a big issue for us.

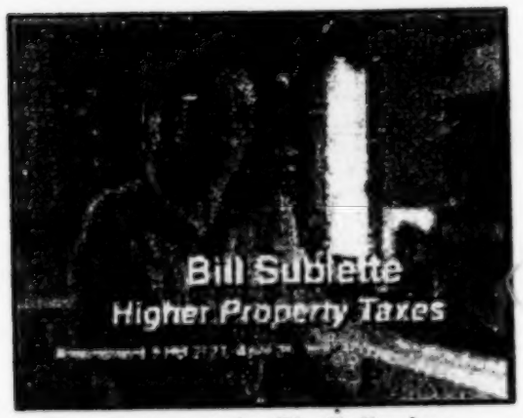
679

[PENNINGTON EXHIBIT 4-1]

[2 of 4]

That's why I was so upset that Bill Sublette was the only Republican to vote for higher property

[3 of 4]



taxes. Fortunately, Ric Keller is a fighter for lower taxes and a simpler tax plan. In the election for congress

680

[PENNINGTON EXHIBIT 4-1]

[4 of 4]

it's a clear choice: higher taxes with Bill Sublette or lower taxes with Ric Keller.

681

[PENNINGTON EXHIBIT 4-2]

CMR Ad Detector – CMAG Reports

BRAND: POL-CONGRESS+

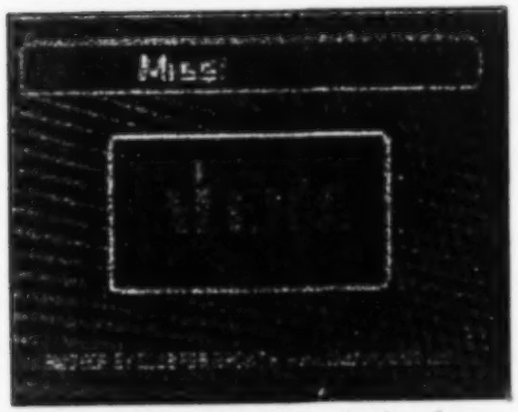
TITLE: FL/NA Keller Chapin Mission for Voters

COMMERCIAL: FL/NA Keller Chapin Mission for Voters
1 of 1

LENGTH: 30

FRAMES: 7

[Frame 1 of 7]



[Announcer]: This is a mission for Orange County Republican runoff voters. You must find a conservative Republican for Congress who

682

[PENNINGTON EXHIBIT 4-2]

[2 of 7]

will battle liberal Democrat Linda Chapin. Ric Keller is the true

[3 of 7]

fiscal conservative in the runoff. Only Ric Keller offers a

683

[PENNINGTON EXHIBIT 4-2]

[4 of 7]

sharp contrast with Chapin with taxes and spending. Keller is a champion

[5 of 7]

fighter for lower taxes and less wasteful spending. This case will self-destruct

684

[PENNINGTON EXHIBIT 4-2]

[6 of 7]

in ten seconds. Remember, only a tax cutter like Ric Keller

[7 of 7]

can compete with liberal Linda Chapin.

685

[PENNINGTON EXHIBIT 5-1]

CMR Ad Detector – CMAG Reports

BRAND: POL-CONGRESS+

TITLE: FL/RLC Keller An Embarrassment

COMMERCIAL: FL/RLC Keller An Embarrassment

1 of 1

LENGTH: 30

FRAMES: 7

[Frame 1 of 7]

[Announcer]: Ric Keller has become an embarrassment. He claims to be a conservative but got caught getting help from liberal Democrat Linda

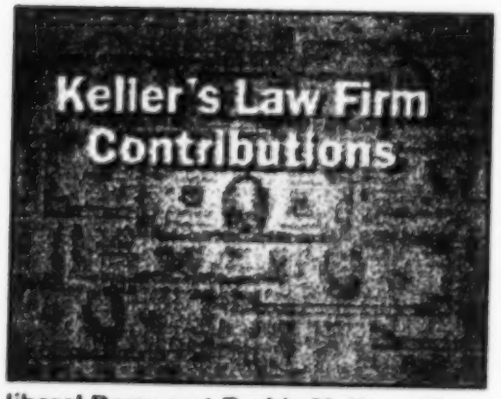
686

[PENNINGTON EXHIBIT 5-1]

[2 of 7]

Chapin, and Keller's law firm coughed up campaign contributions for

[3 of 7]



liberal Democrat Buddy McKay. Ric Keller even supported

687

[PENNINGTON EXHIBIT 5-1]

[4 of 7]

the Clinton-Gore billion dollar tax on food. Ric Keller, who

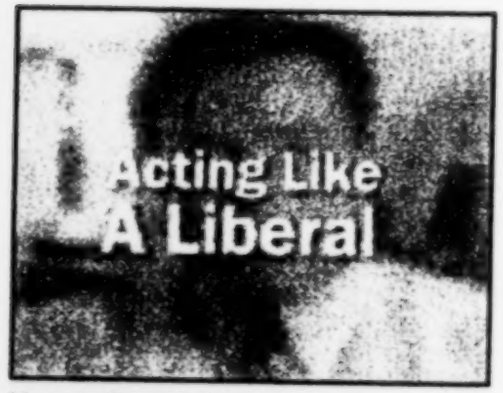
[5 of 7]

proclaims to be a conservative but gets caught acting like a liberal.

688

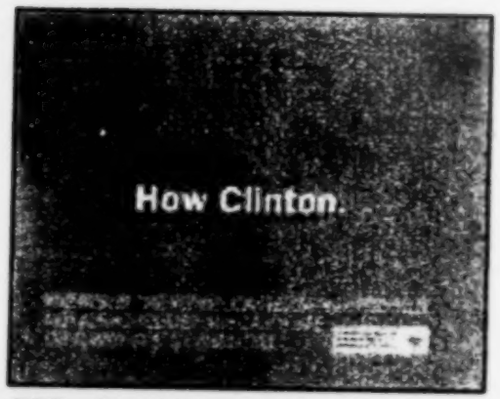
[PENNINGTON EXHIBIT 5-1]

[6 of 7]



How embarrassing. How wrong. How Cllinton.

[7 of 7]



(PFB: Republican Leadership Council)

689

[PENNINGTON EXHIBIT 5-2]

CMR Ad Detector – CMAG Reports

BRAND: POL-CONGRESS+

TITLE: FL/RLC Keller Says He's Conservative

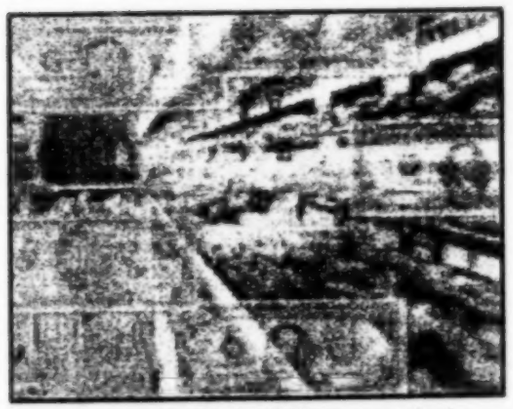
COMMERCIAL: FL/RLC Keller Says He's Conservative

1 of 1

LENGTH: 30

FRAMES: 7

[Frame 1 of 7]



[Announcer]: Rick Keller says he's conservative. But Rick Keller supported the billion dollar tax on food. He says

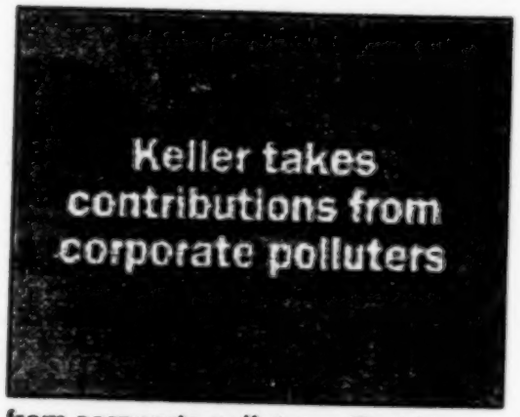
690

[PENNINGTON EXHIBIT 5-2]

[2 of 7]

he wanted new taxes to help the environment, but he takes campaign contributions

[3 of 7]



from corporate polluters. That is hypocritically liberal. And Rick

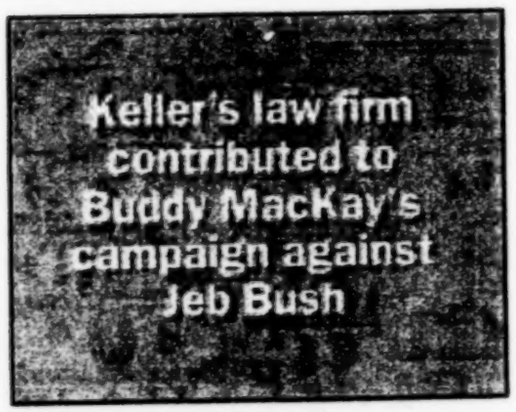
691

[PENNINGTON EXHIBIT 5-2]

[4 of 7]

Keller's law firm actuall contributed to Democrat Buddy MacKay's campaign

[5 of 7]



against Jeb Bush. That's outrageously liberal.

692

[PENNINGTON EXHIBIT 5-2]

[6 of 7]

Keller. He talks conservative, but he acts like a liberal.

[7 of 7]

[PFB Republican Leadership Council]

DECLARATION OF JOHN PESCHONG

I, John A. Peschong, hereby swear and depose as follows, based on my own personal knowledge:

1. I am currently the Republican National Committee's Regional Political Director for the Western Region. I am submitting this declaration to address two topics: (a) development and implementation of "Victory" plans and programs, and (b) my observation of interest group activity in recent election campaigns.

[*2] Personal Background

2. As Regional Political Director for the Western Region, I have responsibility for California, Nevada, Idaho, Washington, Oregon, Alaska, Hawaii, Guam, American Samoa, the Virgin Islands, and Puerto Rico. I work with the Republican party organizations in these states to assist them in communicating the Republican message and helping to elect Republican local, state, and federal candidates. I have held this position since 1998.

3. Before becoming Regional Political Director of the Western Region, I served as Executive Director of Campaign America, a multi-candidate political committee, from 1997 to 1998. From 1994 to 1997, I was the Executive Director of the California Republican Party. Prior to that, I held positions as press secretary for a United States Senate candidate, as partner in a private public relations firm, in the White House Office of Communications during the Reagan Administration, at the Commission on the Bi-Centennial of the United States Constitution, at the RNC, and at the Fund for America's Future (another multi-candidate political committee). I graduated from Loyola Marymount University in 1984.

Development and Implementation of Victory Plans

4. Each election year, every state Republican party drafts a "Victory Plan." These plans set forth programs designed to register voters, identify sympathetic voters, persuade undecided voters, mobilize voters and get them to the polls on election day, and encourage absentee voting by registered voters who are unable to vote in person on election day. These programs support the entire Republican ticket, and frequently place more emphasis on high profile state-wide races than on federal races, especially when no federal candidate is running state-wide. These Victory Plans generally have numerous components, including direct mail, **[*3]** telephone banks to identify and then mobilize sympathetic voters, brochures, slate cards, yard signs, and bumper stickers, rallies, and door-to-door volunteer activities to distribute literature and "door hangers." By their nature, the Victory Plans and the programs specified in them span the calendar year, not just the 60 or 120 days prior to the election.

5. Victory Plans are the result of a process that requires local, state, and national Republican organizations, as well as representatives from the candidates' campaigns, to work closely together. The initial drafting of the Victory Plan is the responsibility of the state party, but an important part of my job responsibility as western regional political director for the RNC is to consult with and advise the state parties during this initial drafting process. Each state party's Victory Plan reflects its own unique needs, opportunities, and circumstances.

6. Once the state party has prepared an initial draft of its Victory Plan, a meeting is convened to review and finalize the plan. Attendees at this meeting include officials from the state party, the RNC's regional political director, personnel from the Republican National Committee headquarters, and sometimes representatives from the

campaign organizations of state and/or federal candidates. It would not be unusual, for example, for representatives of a gubernatorial candidate to participate in the development of a Victory Plan.

7. At this meeting, a number of topics are discussed. The national party representatives are especially interested in ensuring that the programs set forth in the plan are likely to achieve maximum effectiveness for the entire ticket. The budget for the plan is also discussed as is staffing for the programs. Finally, participants in the meeting discuss how costs will be shared, the amount of funding the RNC will provide, and the RNC's assistance to the state party in raising the state party's share of the funding. As I understand it, Federal Election Commission regulations dictate the percentage of federally-regulated versus state-regulated [*4] funding that can go into the plan, but the relative financial participation in the plan as between the RNC and the state party is a matter of negotiation.

8. The RNC typically provides a very substantial share of the funding for the state victory programs. For example, attached to this declaration is the California Republican Party Victory Plan for 2000. See RNC Exhibit 762, attached as Attachment A hereto. Out of a total estimated cost of $23,735,100, the RNC provided $8.3 million. The RNC's assistance in funding these programs is essential to their effectiveness.

9. In addition to providing money directly to support the Victory Plans, the RNC also assists the state parties in raising money for their Victory Plans. For example, the RNC provides big-name surrogates to appear at fundraisers for the state party. This year, for example, the RNC arranged for President Bush to make an August 23 fundraising appearance and Vice President Cheney to appear on February 19 and August 7 to benefit the Republican

gubernatorial candidate and the California Republican Party. It is my understanding that the RNC itself received none of the proceeds from those three fundraising events, but that the California Republican Party received approximately $2 million. Thus, when both its direct financial contributions and its fundraising assistance are considered, the RNC is often responsible for well more than half of the funding for the state Victory Plans.

10. It is my understanding that the Bipartisan Campaign Reform Act of 2002 will require radical changes in the way Republican Party plans, structures, funds, and implements its Victory Plans. In particular, I understand that all, or virtually all, of the funding for victory programs will be federally-regulated, since funding must consist of a combination of federal dollars and so-called "Levin funds." Whereas California state law allows the non-federal portion of the Victory programs to be funded with corporate, union, and individual contributions, the [*5] BCRA places a $10,000 limit on such donations. Moreover, I understand that BCRA will restrict the ability of national parties from transferring money to the state parties to fund the victory programs. I also understand that the BCRA prohibits national parties from assisting state parties in raising so-called "Levin funds." Finally, I understand that agents of the RNC are prohibited from being involved in raising, spending, or directing non-federal funds (including "Levin funds").

11. Thus, BCRA will discourage national party participation in the development and implementation of Victory Plans, since the "cost" of national party involvement is to require payment for the programs with 100% federal money. Moreover, the financial impact on the ability of state parties to fund these programs without national party assistance will be severe. In short, based upon my 9 years of experience with these programs in California and other states, it is my strong opinion that BCRA will severely impede the

ability of local, state, and national parties to work together on these full-ticket Victory Plans and programs, and will greatly diminish the resources available for such activities.

Interest Group Activity

12. During my time as Executive Director of the Californian Republican Party and as Regional Political Director for the RNC, I have had occasion to observe and follow carefully the election-oriented activities of numerous special interest groups. In California, a wide-range of interest groups adverse to the message and candidates of the Republican Party have been active in recent years, including the AFL-CIO, the National Education Association ("NEA") and its affiliate the California Teachers Association ("CTA"), the National Association for the Advancement of Colored People ("NAACP""), the Sierra Club, the National Abortion Rights Action League ("NARAL") and its affiliate the California Abortion Rights Action League **[*6]** ("CARAL"), and others. These special interest groups tend to focus on a single issue or a relatively narrow range of issues, and these groups in particular are reliable and vigorous opponents of the Republican message and candidates.

13. These and other interest groups use a variety of techniques to communicate their respective messages. These techniques include broadcast issue advocacy, direct mail, telephone banks, door-to-door mobilization, distribution of absentee ballots, and providing transportation to the polls for supporters.

14. In recent election cycles, I have observed that some of the major interest groups, such as the AFL-CIO, NEA, CTA, and NAACP, have reduced their reliance on broadcast issue advocacy, and shifted reliance to grassroots voter mobilization activities. Based on my observation, the activities of these groups follow a typical pattern:

a. These groups begin telephone bank activity to identify supporters 4-8 weeks before the election.

b. For the next few weeks, these groups proceed to a direct mail issue advocacy program targeted to their identified supporters and prior donors. Also during this period, these groups begin distribution of absentee ballot applications.

c. Two weeks before the election, I have observed these groups begin intensive get-out-the vote and voter mobilization activities. In particular, they begin transporting supporters to early voting locations, resume operating phone banks with strong get-out-the-vote messages, and employ persons to walk door-to-door in sympathetic neighborhoods to distribute literature and collect absentee ballots.

d. On election day, poll watchers for certain of these interest groups monitor turnout in heavily-Democratic precincts, and if turnout is low they direct their telephone hanks to focus calls on households within those precincts.

15. The net effect of these enhanced grassroots voter mobilization efforts has been impressive. In the 1996 and 2000 presidential elections, as well as the 1998 California **[*7]** gubernatorial election, the Democratic ticket significantly outperformed the Republican ticket in relation to the final pre-election day polls. Looking at the 2000 presidential election as an example, in the days leading up to the election, it was reported that a Zogby poll had Vice President Gore's lead over then Governor Bush pegged at 43 percent to 40 percent, a Rasmussen poll also predicted the margin to be 3 points, and a Research 2000 poll showed the vice president leading by seven percentage points. The actual margin of victory in California was 12 points. As a result, following the 2000

election, the RNC initiated a "72-hour Task Force" to analyze what the opposition was doing in the days and weeks leading up to the election and to formulate recommendations to improve turnout for the Republican ticket. I provided information and advice to the 72-hour Task Force. A portion of the Task Force's findings are included in RNC Exhibit No. 418, attached as Attachment B hereto. The findings of the 72-hour Task Force were consistent with my observations, set forth above. As a result of the task force, the RNC is redoubling its efforts to focus on voter mobilization and get-out-the-vote efforts. This year, for example, the plans in my region are as follows:

a. Beginning approximately 6 weeks before the election, the state Republican parties will operate volunteer phone banks to identify sympathetic voters. Using funds provided by their state counterparts, county Republican parties will open and staff volunteer support offices statewide for these activities. Volunteers are used for both the obvious financial reasons and because under Federal Election Commission regulations the costs associated with such volunteer activity need not be counted as in-kind contributions to federal candidates.

b. Starting in the fourth week before the election volunteers will begin hand distributing issue advocacy fliers door to door. These pieces will complement similar direct mail, as well as absentee ballot applications and slate cards. Volunteers will follow up with phone calls.

c. In the last 2 weeks before the election, the focus will turn to voter mobilization and turnout. This effort will be largely through volunteer telephone banks, and door-to-door activities. **[*8]** Volunteers will distribute slate card "door hangers" in targeted neighborhoods. These door hangers show the Republican slate of candidates. In California this year, there are 9 state candidates on the ballot, and only 1

federal candidate. In California alone, we anticipate spending approximately $4 million on the task force-inspired efforts. In view of the state versus federal composition of the ballot, the overwhelming majority of funding will be with state-regulated rather than federally-regulated funds.

16. Although the state Republican parties cannot hope to match the resources for these activities that the various interest groups will devote to them, we are guardedly optimistic that our efforts will show results for the Republican ticket at the polls on November 5th.

17. As set forth above, it is my understanding and firm belief that BCRA will severely impede the ability of the Republican Party to engage in these activities by limiting the amount of funding as well as the ability of local, state, and national party representatives to work together. Indeed, under BCRA, if I continued my current involvement in the planning and implementation of state party victory programs, my involvement alone could very well require the state parties to fund those programs with 100% federal dollars.

18. In contrast, I understand that BCRA places no restrictions whatsoever on the grassroots activities of interest groups. While I understand that BCRA restricts the ability of interest groups to air broadcast issue advertisements within 60 days of a federal election, it is my observation that the activities of many major interest groups during this "window" have already begun to shift to grassroots rather than broadcast activities. Because interest groups can use wholly unregulated and unreported money from union dues, corporate treasuries, or wealthy individuals for these activities, while political parties must use federally-regulated funds **[*9]** (including Levin funds), political parties will be at a severe disadvantage in relation to interest groups.

19. I believe the ability of political parties to function effectively is jeopardized by BCRA.

I declare under penalty of perjury that the foregoing is true and correct.

s/
John Peschong

Dated: October 3, 2002

[EXHIBITS OMITTED]

Declaration of Lawrence D. Pratt

* * *

[19]
These recordkeeping and reporting requirements, together with other FEC requirements, have been, and continue to be, extremely burdensome for both GOA and GOAPVF, involving significant expenditures of administrative time, effort, and expense, as well as actual out-of-pocket expenditures that have been considerable. As GOA's FEC reports indicate (*see* paragraph 14, below, and Exhibit D hereto), its gross contributions have not exceeded $290,000 per year, and they are normally substantially less (*e.g.*, $28,615 in 1993, $72,756 in 1994, $12,970 in 1995, $91,717 in 1998, $145,953 in 2001). Yet I would estimate the real cost of maintaining and operating GOAPVF, as an SSF complying with the FEC's recordkeeping and reporting requirements, at between $5,000 and $15,000 per year, at a [20] minimum, depending on the number of reports that were filed in a particular year. This amount could be substantially more, of course, if it became necessary to seek an advisory opinion, or FEC compliance questions arose, and legal advice and/or representation became necessary.

14. GOAPVF has filed various reports with the Federal Election Commission from the inception of GOAPVF in 1992 to the present. All of GOAPVF's reports are on file with the Federal Election Commission, and copies of those reports were furnished to the defendants during the course of discovery in this action. Attached hereto as Pratt GOA/GOAPVF Declaration Group Exhibit D are true copies of GOAPVF's year-end reports (FEC Forms 3X) filed by GOAPVF with the Federal Election Commission each year, from 1992 through 2001. These January 31 Year-End Reports (FEC Forms 3X) are only some of the reports that GOAPVF has been required to file with the FEC, but they are demonstrative of the recordkeeping detail that is required by the FECA/BCRA, and they help to illustrate the burdens

and restrictions imposed upon political committees under those laws, as indicated with more specificity in paragraph 13, above.

15. As pointed out by Mr. Walter Olson, one of the plaintiffs' expert witnesses in this action (Declaration of Walter J. Olson, ¶¶ 7-15, 116), who also serves as GOAPVF's treasurer, and as confirmed in paragraph 13 of this Declaration above, these FEC filing and reporting requirements with respect to SSFs are quite burdensome, and I can confirm that these burdens have been, and continue to be, extraordinary, unduly harmful burdens for GOAPVF.

16. The burdens and restrictions imposed upon GOAPVF by the FECA/BCRA, which GOA and GOAPVF contend are unconstitutional, include the following: as a political committee, GOAPVF is required to comply with statutorily-imposed licensing regulations, [21] editorial control, and discriminatory economic burdens, to wit: (i) registration with the FEC as a political committee, as required by 2 U.S.C. Section 433, in order to be permitted to engage in any communicative activity expressly advocating the election or defeat of a candidate for federal office; (ii) the filing of periodic reports, open to the public, of receipts and disbursements, as required by 2 U.S.C. Section 434, in order to be permitted to continue to engage in such communicative activity; and (iii) compliance with limits upon individual financial contributions, as specified by 2 U.S.C. Sections 441a, 441d, 441f, and 441g, and reporting to the FEC the names, addresses, occupations, and employers of said contributors, as required by 2 U.S.C. Section 434, in order to convey GOAPVF's candidate preferences in a federal election. These are substantial burdens, in terms of time and effort expended, out-of-pocket expense and employee salaries, and distraction from the substantive activities of GOAPVF (as well as GOA itself), that greatly interfere with the free exercise of the First Amendment rights of GOA and GOAPVF, and inhibit the ability of GOAPVF to carry out its activities with respect to federal elections.

17. As indicated in paragraph 43 of its Amended Complaint herein, GOAPVF has been, currently is, and will continue to be, injured by the BCRA/FECA's system of prior restraints and discriminatory regulation, including: (a) registration with, reporting to and disclosure of the names, addresses, occupations, and employers of certain contributors, to the FEC; and (b) compliance with contribution limits imposed upon political committees independent of a candidate and a political party, having been neither raised nor indexed by BCRA. Such prior restraints and regulations currently impose, and will continue to impose, discriminatory economic burdens and penalties upon GOAPVF's communicative activity [22] expressly advocating or opposing the election of candidates to federal office, thereby preventing GOAPVF, by threat of injunctive, and other restraining, action and civil and criminal penalties, as enhanced by BCRA, from engaging in the quality and quantity of political communications that GOAPVF would choose in its editorial discretion, but for the licensing power, editorial control and economic burdens and penalties placed upon them by BCRA/FECA.

* * *

[1 (8 PCS/MC 29)]

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Senator Mitch McConnell, *et al.*, Plaintiffs,	)	Case No. 02-0582 (CKK, KLH, RJL) *All consolidated cases.*
v.	)	
Federal Election Commission, *et. al.*, Defendants.	)	

Declaration of William H. Pryor Jr.,
Attorney General of Alabama

I, William H. Pryor Jr., declare the following on personal knowledge:

1. I am an Alabama resident and a U.S. citizen.

2. I am now the Attorney General of the State of Alabama, and I am presently the Republican Party candidate for this calendar year election for Attorney General. I may be a candidate for some other political office in future elections.

3. As an officeholder of and candidate for state office, I have and intend in the future to made public communications that refer to candidates for federal office and that promote or support candidates or attack or oppose candidates for federal office, including communications that do not expressly advocate a vote for or against a candidate. In the course of my campaigns and as an officeholder, I have referred to such candidates for federal office as now Senator Jeff Sessions (R.-Ala.), who I succeeded in office, Senator Richard Shelby (R.-Ala.), Congressman Spencer Bachus (R.-Ala.), now President Bush, and others in several ways for several purposes:

a. In my campaign literature, which I hereby verify a true and correct copy [2 (8 PCS/MC 30)] of which has

been attached as Exhibit A ("Attorney General Bill Pryor: Protecting the Security, Integrity, and Future of Alabama" brochure (1784-91)); Exhibit B ("Attorney General Bill Pryor: Protecting the Security, Integrity, and Future of Alabama" brochure (1792-93));

b. In press releases, which I hereby verify true and correct copies of which have been attached as Exhibit C (release mentioning now President George W. Bush (1794-1811)); Exhibit D (release mentioning now U.S. Senator Jeff Sessions (1812-29)); Exhibit E (release mentioning Congressman Spencer Bachus (1830-32)); and Exhibit F (release mentioning Senator Richard Shelby (1833-34));

c. In official communications, which I hereby verify true and correct copies of which have been attached as Exhibit G ("Testimony of Attorney General Bill Pryor on the Clean Air Act New Source Review Joint Hearing Before the Senate Committee on Environment and Public Works and the Senate Committee on the Judiciary" (July 16, 2002) (1835-41)); Exhibit H ("Testimony of Attorney General Bill Pryor on the Clean Air Act New Source Review Joint Hearing Before the Senate Committee on Environment and Public Works and the Senate Committee on the Judiciary" (July 16, 2002) (annotated) (1842-48); Exhibit I ("New Source Review: Recommendations" (June 2002, EPA) (1849-55)); Exhibit J (June16, 1998, letter from Bill Pryor to Janet Reno re "fighting election fraud in rural Alabama" (1856-57)); Exhibit K ("Time Sensitive" memo re amicus brief re Bush case seeking to halt Florida manual recounts (1858)); Exhibit L (June 28, 2002, letter from Bill Pryor to named senators and congressmen re Alabama [3 (8 PCS/MC 31)] Medicaid program (1859-

60)); Exhibit M (Alabama amici curiae brief in *Bush v. Palm Beach County Canvassing Board* (U.S. Supreme Court) (1861-80)); Exhibit N (Alabama amici curiae brief in *Bush v. Gore* (U.S. Supreme Court) (1881-1901)); and Exhibit O (Alabama amici curiae brief in *Siegel v. LePore* (11th Cir.)(1902-36)).

4. As a result of the Bipartisan Campaign Reform Act of 2002 ("BCRA"), I will be forbidden to spend funds not subject to the Federal Election Campaign Act of 1971 ("FECA") for such activities. State political candidates and officeholders, such as I am and have been, are thus faced with a decision by the BCRA: I can continue to refer to candidates for federal office and thereby agree to be subject to the stringent requirements of the FECA in expending funds in public communications that refer to, attacks, promotes, or supports a candidate for federal office. This is a costly and chilling price to be paid for on any communication that even refers to a candidate for federal office. In the alternative, I can forego any reference to any possible candidate for federal office. This limitation is, however, a severe impediment on my ability to communicate my views on political and legal issues to potential voters in any campaign, especially for state-wide office, and makes it difficult or impossible to represent the people in an official capacity.

5. Being able, without penalty, to refer to federal candidates is important to my ability to effectively campaign and to communicate in my official capacity. Voters and citizens might more easily understand and identify with my proposed policies by associating them with other political figures, whether or not they are presently "candidates" for federal office. Further, to fulfill my office as Attorney General effectively, I must often refer to federal candidates because [4 (8 PCS/MC 32)] they offer legal proposals which must be analyzed and would affect state law and policy and because they often become involved in legal controversies.

My official duties would be significantly impeded if I were unable to refer to federal candidates who sponsor or propose legislation or who are involved in litigation that might affect the people of Alabama.

6. My references to federal candidates often has nothing whatever to do with trying to help any federal candidate to get elected, but rather is simply a means to communicate the nature of my ideas and policies to voters or to the citizens of Alabama. In fact, whether or not public figures I might refer to are presently federal "candidates" is usually entirely irrelevant to my purpose – and I often would not even know whether any specific public figure I referred to is presently a "candidate" for any federal office. Yet BCRA effectively forbids me from making any reference to any federal candidate, regardless of the reason that I might find it expedient or necessary to do so.

7. I have received and I hope and intend to receive in the future contributions, which are entirely legal under Alabama law, from the Republican National State Elections Committee, a division of the Republican National Committee ("RNC"), upon recommendation of Republican Attorneys General Association. I verify that a true and correct copy of a "Receipt Transaction List" of donations from the RNC (1937) is attached hereto as Exhibit P. Since the BCRA forbids national political parties to make such campaign contributions, I will certainly be harmed as a result of this law in any future campaign efforts for elective office.

8. As a candidate, I raised and spent funds in the past and in this election cycle without regard to the limitations, prohibitions, and reporting requirements of the FECA for the purpose of: (a) making public communications that refer to a clearly identified candidates for federal [5 (8 PCS/MC 33)] office and that promote or support candidates or attack or oppose candidates for that office, including communications that do not expressly advocate a vote for or against such candidates; (b) engaging in voter

registration activities conducted within 120 days of a federal election, and (c) engaging in voter identification, get-out-the-vote, and generic campaign activities conducted in connection with an election in which a candidate for federal office is on the ballot. The BCRA will henceforth forbid me from using funds that I received entirely in accord with Alabama law to conduct these activities, causing substantial harm to my ability to conduct a campaign effectively.

9. As a candidate in association with or in a group of candidates for state and local office and of individuals holding state and local office, I have in the past and intend in the future to spend funds lawfully raised to campaign for state office, but raised and spent without regard to the limitations, prohibitions, and reporting requirements of the FECA for the purpose of: (a) making public communications that refer to a clearly identified candidates for federal office and that promote or support candidates or attack or oppose candidates for that office, including communications that do not expressly advocate a vote for or against such candidates; (b) engaging in voter registration activities conducted within 120 days of a federal election, and (c) engaging in voter identification, get-out-the-vote, and generic campaign activities conducted in connection with an election in which a candidate for federal office is on the ballot. Yet the BCRA will henceforth forbid me from using funds that I received entirely in accord with Alabama law to conduct these activities, causing substantial harm to my ability to conduct a campaign effectively.

10. As a candidate on my own behalf and as a candidate in association with or in a group [6 (8 PCS/MC 34)] of candidates for state and local office and of individuals holding state and local office, I spend funds to engage in voter registration, voter identification, get-out-the-vote, and generic campaign activities in order to further my own election campaign, rather than to further the campaign of any candidate for federal office who might incidentally benefit from expenditure of such funds. It is more cost effective and efficient to join together with other state and local candidates in common cause to engage in such activities that we deem mutually beneficial to our campaigns, regardless how they might affect the campaigns of candidates for federal office. Yet the BCRA in effect penalizes state candidates, such as I am, who expend funds in this manner, regardless of the purpose for which such funds are intended.

11. Although I might raise funds subject to FECA for public communications that refer to federal candidates and to engage in voter registration, voter identification, get-out-the-vote, and generic campaign activities, this would involve significant restrictions and administrative costs on any such expenditure. Separate reports the Federal Election Commission and separate funds would be required, involving substantial administrative costs. Moreover, there would be severe limitations on the sources and amounts of funds that could be raised because, for example, no corporate or labor union contribution could be accepted and individual contributions are subject to the $5000 per individual and $25,000 gross annual individual contribution levels imposed by FECA. For a state candidate for political office such as myself, therefore, raising funds subject to FECA would substantially impair my ability to conduct a state campaign through such general activities as voter registration and get-out-the-vote efforts regardless how it might affect any candidate for federal office. [7 (8 PCS/MC 35)]

VERIFICATION OF DECLARATION

I verify that the foregoing Declaration of Alabama Attorney General Bill Pryor in *McConnell, et al. v. FEC, et al.*, Case No. 02-0582 (CKK, KLH, RJL) (consolidated action) is true and correct.

Executed this 1st day of October, 2002.

/s/ Bill Pryor
Bill Pryor
Attorney General
State of Alabama

DECLARATION OF WADE RANDLETT

1. My name is Wade Randlett.

2. I am Chief Executive Officer of Dashboard Technology ("Dashboard"), a World Wide Web technology consulting firm based in San Francisco, California. Dashboard specializes in the design, implementation and support of software that displays customized information for specific audiences. Prior to founding Dashboard in 2001, I served on the management teams of two other software companies: Sigma Storage from 2000 to 2001 and Red Gorilla from 1999 to 2000. From 1996 to 1999, I was the Democratic political director at the Technology Network, also known as TechNet, a Palo Alto-based non-profit corporation and political service organization which I co-founded in 1996. Prior to starting TechNet, I spent many years as a political fundraiser and general political consultant, working primarily in the Silicon Valley area of Northern California, but also throughout California and to some extent in major metropolitan areas in other parts of the nation. [2]

3. From the 1996 election cycle through the 2000 cycle, I raised seven-digit sums in both federal funds ("hard money") and non-federal funds ("soft money") for candidates and national party committees. During this same period, I hosted or helped organize over 100 fundraising events featuring federal candidates or office holders. Many of these events were attended by Democrats who held senior government positions, such as then-President Bill Clinton and then-Vice President Al Gore. When I was at TechNet, my Republican counterparts there arranged similar events involving senior Republicans, such as then-Governor George W. Bush.

4. In my experience, hard money contributions tend to differ from soft money donations in ways that are not just quantitative, but qualitative. Most hard money is given for reasons that are fundamentally personal. Even PAC

contributions originate with individuals. Hard money contributors tend to support only candidates whom they know, like, and/or are philosophically aligned with in a broad sense. Conservative Republicans don't usually give hard money to liberal Democrats and vice versa. Accordingly, the pitch from the politician raising hard money does not typically focus on a particular piece of legislation, or even a group of bills. Instead, it tends to be broader and more personal.

5. Conversely, many soft money donations are not given for personal or philosophical reasons. They are given by donors with a lot of money who believe they need to invest in federal office holders who can protect or advance specific interests through policy action or inaction. Some soft money donors give $250,000, $500,000, or more, year after year, in order to achieve these goals. For most institutional donors, if you're going to put that much money in, you need to see a return, just as though you were investing in a corporation or some other economic venture. And even soft money donors whose primary motives are not financial usually [3] want attention, visibility, and support on a particular policy issue or set of issues, either from the candidate or office holder who makes the "ask," or from one or more others aligned with the solicitor.

6. National party committees often feel they need to raise a certain amount of soft money for a given election cycle. To reach that overall goal, they may divide up potential donors by geography, affiliated organization, or issue interests. The party committees decide which Members of Congress should contact these potential donors, and these Members then put in a certain amount of call time at the national committee soliciting the money. A Member and a potential donor may be matched because the Member is on a legislative committee in which the donor has a particular interest, whether economic or ideological. For example, Commerce Committee members will call potential

donors from an industry with issues before the Committee, and Judiciary Committee members will call donors who have issues there. Members in leadership may also be able to make these calls, since they have a horizontal influence across all committees.

7. Members of Congress raise soft money to help with federal campaigns, not for "party building" activities. In my experience, most federal office holders care little about true party building. The Members and the donors understand that the soft money will be used to help federal candidates win elections.

8. I've been involved in political fundraising long enough to remember when soft money had little value to federal candidates. Ten years ago, a Senator might call a potential donor and the donor would say something like, "I would love to write you a check; I'm a big fan of yours; but I'm federally maxed, so I can't do it. If you like, I could write a soft money check [4] to your state party." And the Senator might say, "Don't bother. The soft money just doesn't do me any good."

9. However, in recent election cycles, Members and national committees have asked soft money donors to write soft money checks to state and national parties solely in order to assist federal campaigns. Most soft money donors don't ask and don't care why the money is going to a particular state party, a party with which they may have no connection. What matters is that the donor has done what the Member asked.

10. Information about what soft money donors have given travels among the Members in different ways. Obviously the Member who solicited the money knows. Members also know who is involved with the various major donor events which they attend, such as retreats, meetings and conference calls. And there is communication among Members about who has made soft money donations and at

what level they have given, and this is widely known and understood by the Members and their staff.

11. As a donor with business goals, if you want to enhance your chances of getting your issues paid attention to and favorably reviewed by Members of Congress, bipartisanship is the right way to go. Giving lots of soft money to both sides is the right way to go from the most pragmatic perspective.

12. Conversely, if you're giving a lot of soft money to one side, the other side knows. For many economically-oriented donors, there is a risk in giving to only one side, because the other side may read through FEC reports and have staff or a friendly lobbyist call and indicate that someone with interests before a certain committee has had their contributions to the other side noticed. They'll get a message that basically asks: "Are you sure you want to be giving only to one side? Don't you want to have friends on both sides of the aisle?" If your interests [5] are subject to anger from the other side of the aisle, you need to fear that you may suffer a penalty if you don't give. First of all, it's hard to get attention for your issue if you're not giving. Then, once you've decided to play the money game, you have to worry about being imbalanced, especially if there's bipartisan control or influence in Washington, which there usually is. In fact, during the 1990's, it became more and more acceptable to call someone, saying you saw he gave to this person, so he should also give to you or the person's opponent. Referring to someone's financial activity in the political arena used to be clearly off limits, and now it's increasingly common.

13. Soft money donors and fundraisers definitely get a special level of access, visibility, and appreciation from Members that is not available to smaller hard money donors, much less the average person. They get a level of attention that a $1,000 hard money donor never will. Even someone who wrote 25 $1,000 hard money checks but no soft money

is going to get much less attention and appreciation than someone who wrote one large soft money check.

14. The raising and spending of soft money in recent election cycles has distorted the federal political system and the commercial marketplace. Many soft money donations are made in order to advance specific legislative agendas, and they do produce at least appreciation on the part of powerful federal office holders. Based on my observations, much of the business community believes that the federal campaign financing system is broken and needs to be fixed. People in business look for a reasonable, rational system and a level playing field. The current soft money-oriented system does not meet that standard. At the same time, many members of the business community recognize that if they want to influence what happens in Washington, they have to play the soft money game. They are caught in an arms race that is accelerating, but that many feel they cannot afford to leave or speak out against. [6]

15. Soft money fundraising also takes a lot less time and effort than hard money fundraising. Like anyone else, politicians have only 24 hours in a day. As it has become increasingly valuable for office holders to spend time with people who are writing huge checks, they have allocated more of their time to that. That means they have less time to devote to other things that are part of their jobs, such as talking to their constituents.

16. It would be absurd to claim that the soft money ban will result in all the same soft money donors banding together to finance independent expenditures and that all this money will still have the exact same bad effect it has today. Most of these donations are made because they are solicited. The number of people sitting around trying to figure out how to spend a million dollars in electoral politics, and just getting advice from interest group or national party committee staff on how to do it, is very, very small. The core transaction is an elected official talking to an individual who

may write a soft money check in order to receive positive attention for an issue. When you take that act out of the equation, a great deal of the inappropriate influence leaves the system.

17. Without other restrictions, one potential method of evading the national party soft money ban that I would be concerned about would involve a political consultant, working with some level of pre-arrangement with an office holder, say a Senator, and persuading a corporate donor that the Senator wants the donor to run a lot of "issue ads" that will help him or her in a given state. Then some time in the following few months, the donor might get a phone call from the Senator, or be invited to a meeting or small event with the Senator, and be told how much he or she appreciates what they've been doing, but never having to say anything about what they did or what happened with that money. That kind of proxy, "wink and a nod" scenario takes the [7] core soft money transaction as it works today and adds one layer of complexity. But it's not a big layer.

18. In my experience, campaign advertising is meant to leave impressions or feelings about whether to elect a candidate, either positive or negative. Whether the "magic words" of express advocacy are included in the ad has no impact on whether a campaign ad is effective. For example, ads that portray a particular candidate as "for tax increases" or "against social security" are clearly electioneering, regardless of what particular words are used.

19. Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

SENATOR MITCH McCONNELL, et al.,	) Civil Action No. 02-0582
Plaintiffs,	) (CKK, KLH, RJL)
v.	
FEDERAL ELECTION COMMISSION, et al.,	) **CONSOLIDATED ACTIONS**
Defendants.	

DECLARATION OF ANTHONY D. ROMERO

Pursuant to 28 U.S.C.§ 1746, I hereby declare as follows:

1. I am the executive director of the American Civil Liberties Union ("ACLU"), a position I have held since September 2001. In that capacity, I am responsible for managing the operations of the entire organization – including its legislative activities. My responsibilities also include raising funds for the organization through membership and other fundraising activities.

2. The ACLU is a nationwide, non-profit, non-partisan organization with approximately 300,000 members dedicated to the principles of liberty and equality embodied

in the Constitution. It is also a tax-exempt organization under § 510(c)(4) of the Internal Revenue Code. The ACLU is incorporated in Washington, D.C.

3. The ACLU engages in non-partisan legislative activities designed to influence federal legislation involving civil rights and civil liberties issues of national importance. As a 501 (c) (4) organization, the ACLU does not engage in any federal election activity as defined by the Federal Election Campaign Act. The ACLU has never taken a position in a partisan political election in its 82 year history. However, it frequently takes positions on public issues of significance to the organization and its members. As an advocacy organization, the ACLU has frequent conversations with federal officials and candidates about civil liberties issues. However, neither those conversations nor any subsequent communications by the ACLU are intended to encourage individuals to support or oppose a candidate for federal office.

4. Although the ACLU does not endorse or oppose the election of candidates, its public statements, member communications, and other similar activities frequently and necessarily refer to, praise, criticize, set forth, describe, or rate the conduct or actions of clearly identified public officials who may also happen to be candidates for federal office. The fact that a public official identified in ACLU statements or writings is also at the time a candidate for public office is not directly related to the intent or purpose of influencing the election or defeat of that candidate. The ACLU regularly publicizes in its membership mailings, and through pamphlets and other publications, the civil liberties voting records, positions and actions of elected officials some of whom are candidates for federal office. The ACLU sends out over 6.7 million pieces of mail each year to its members and potential members.

5. The ACLU has never operated a PAC and has no interest in establishing one. The creation of a PAC would be fundamentally inconsistent with the ACLU's mission and identity as a nonpartisan organization. Establishing a PAC would also have serious ramifications for the organization's members. Under the Federal Election Campaign Act, PACs are required to disclose the identity of its contributors. Many ACLU members and contributors request explicit assurances that their membership will remain confidential and that their contributions will remain anonymous. The ACLU has consistently defended the First Amendment right of its members and donors to remain anonymous if they so choose.

6. The ACLU is primarily a membership driven organization and membership is voluntary. Membership dues to the ACLU are not tax deductible. The basic membership fee is $35, though many members contribute more than that. There is also a reduced membership available for students and other low-income individuals. Membership dues accounted for $9,393,948 of the $13,625,051 contributed to the organization by individuals in 2001. Only 212 individuals contributed more than $1000. Although the ACLU does not maintain records on the corporate status of non-individual donors, less than $85,000 of the ACLU's total revenues was contributed by entities such as businesses and other organizations in 2001. None of the contributions from businesses exceeded $500. Annual contributions from labor organizations over the last 10 years have never exceeded $5000. Total contributions from political parties over the same 10 year period were $330. In sum, contributions from non-individual donors represent an insignificant percentage of the ACLU's total annual funding.

7. Historically, much of the ACLU's success has been dependent on the media attention the organization is able to attract. The organization is at the front line of many controversial issues and our views are often sought out. Thus the ACLU's views are frequently reported in both the

print and broadcast media. The ACLU is also regularly invited to discuss its views on broadcast programs such as *Crossfire* or the *The News Hour with Jim Lehrer*. The proliferation of cable television has increased these opportunities. Earned media, however, has serious limitations. The most significant limitation of being dependent on the earned media is the lack of editorial control over how and when the organization's views will be presented. The ACLU cannot always rely on the media to report its activities or to present its views accurately or completely, particularly given the media's dependence on "sound bites" which often skew the ACLU's position. These limitations have become increasingly obvious in the political climate following the 2000 Presidential election and the 9/11 attack on the World Trade Center. Civil liberties have come under fire like no other time since the McCarthy period. More than ever it is imperative that the ACLU's views be heard in an accurate and balanced way.

8. In an effort to curb the assault on civil liberties the ACLU has stepped up its fundraising and media campaigns. Membership in 2001 increased by 30% or 70,000 members. Contributions to the organization also increased 30% or almost 3 million dollars. Projections for 2002 are in line with these numbers. This money will be used to finance the ACLU's large, growing legislative operation and its many activities. The increased revenues will also be used to launch an aggressive media campaign that will involve the paid media. The ACLU's activities will always be heavily reliant on earned media, but hundreds of thousands of dollars have been budgeted to finance a paid media campaign targeting the constituents of elected officials on important civil liberties issues. The Hastert ad campaign that ran in March 2002, and which is described in the ACLU's complaint filed in this case, is just the first of many ads that the organization intends to launch in the future. With the success of our recent fundraising efforts, the ACLU is in a

much stronger position to sponsor paid advertisements focusing on issues like the Department of Homeland Security and immigration reform. This year, for instance, legislation creating a new federal department of Homeland Security is under consideration during this pre-election period. The ACLU took out a full page advertisement in Congress Daily and CQ Monitor urging Congress to safeguard civil liberties in connection with its consideration of the "Gramm – Miller" and "Lieberman" versions of the Homeland Security legislation.

9. The provision of the BCRA that we are challenging in this lawsuit will severely restrain the ACLU's abilities to engage in many of these activities in the future.

10. I am the custodian of the documents that have been produced in discovery or disclosed to the defendants in this case pursuant to the court's scheduling Order. I am informed by counsel that these documents may be used at trial. They are true and correct copies of documents that are created and maintained in the ordinary course of the ACLU's operations.

11. I declare under penalty of perjury, that the foregoing is true and correct.

Executed on this 3rd day of October 2002.

_____

Anthony D. Romero

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

SENATOR MITCH McCONNELL, et al., Plaintiffs, v. FEDERAL ELECTION COMMISSION, et al., Defendants.	Civ. No. 02-582 (CKK, KLH, RJL) All consolidated cases. **COUNSEL ONLY**
AMERICAN FEDERATION OF LABOR AND CONGRESS OF INDUSTRIAL ORGANIZATIONS, et al., Plaintiffs, v. FEDERAL ELECTION COMMISSION, et al., Defendants.	

DECLARATION OF STEVEN ROSENTHAL

Background

1. I am employed by the American Federation of Labor and Congress of Industrial Organizations ("AFL-CIO") as Political Director. In this position I oversee the AFL-CIO

Political Department and am responsible for its day-to-day operations. I have held this position since December 1995. I previously served as Associate Deputy Secretary of the United States Department of Labor from January 1993. I was Deputy Political Director of the Democratic [2] National Committee during 1992, and during the previous 13 years I worked in various organizing, political and legislative positions at the Communications Workers of America.

The AFL-CIO Political Program

2. The AFL-CIO Political Department has primary responsibility for implementing the AFL-CIO's political program, which principally involves the mobilization of union households in the labor movement's electoral political activities; engagement and coordination with the AFL-CIO's 66 affiliated national and international unions, 51 state federations and over 500 area and central labor councils in carrying out these activities; communications with and, where appropriate and advisable, common efforts with national, state and local political party committees and federal, state and local candidates to identify and turn out voters; and administration of the AFL-CIO's separate segregated funds that make contributions to party committees and candidates. Union members and their families are the labor movement's greatest resource for achieving its social and policy goals in advancing the rights and well-being of all working families.

3. The following description of the AFL-CIO's political activities generally applies to those efforts during the 1996, 1998 and 2000 two-year election cycles. The relative extent of these activities has changed somewhat but their basic elements have not. As permitted by the Federal

Election Campaign Act ("FECA"), the AFL-CIO uses its general treasury funds to pay for its membership mobilization efforts.

4. The 1994 general election produced conservative Republican majorities in the United States Senate and House of Representatives that had campaigned on, and proceeded to try to legislate, an agenda hostile to workers and unions and contrary to much of the broad and [3] longstanding legislative and policy positions and priorities of the AFL-CIO and its affiliates. Union household participation in the 1994 election fell from previous elections, in my view largely due to disillusionment over the Clinton Administration's failed health care plan and the passage of the North American Free Trade Agreement, and because the election insufficiently focused on working family concerns such as jobs, wages, Social Security, Medicare and education.

5. After John J. Sweeney's election as AFL-CIO President in October 1995, the AFL-CIO sought to redirect its political program by fostering greater involvement by union members and ending its largely reflexive support of the Democratic Party. The AFL-CIO adopted a revitalized approach to political matters that relied on union member engagement and activism and that supported candidates who embraced working family-friendly policies, regardless of party label, with an electoral goal of pro-working family majorities in Congress and state legislatures. This electoral goal has remained in place in successive election cycles.

6. More broadly, since 1995 the AFL-CIO has undertaken, in coordination with AFL-CIO affiliates, a year-round membership mobilization program centered on working family issues. This mobilization has sought to

activate and engage union households; make the overall public policy agenda responsive to working family issues; hold elected officials and candidates accountable for their votes and policy positions; and elect pro-working family officeholders. Fundamentally, the AFL-CIO seeks to achieve officeholder accountability on legislative and policy matters in a political environment.

7. During 1996 the labor movement's overall program to shape the nation's issue and legislative debate, to elect worker-friendly candidates and to deal with ballot measures that addressed working family issues was called "Labor '96." In 1998 the term "Labor '98" was [4] applied more specifically to the membership mobilization program overseen by the Political Department, and the term "Labor 2000" was used similarly in 2000.

8. At the national level the AFL-CIO's political program has involved AFL-CIO staff and the staff of national and international union affiliates, usually overseen by their political directors. At the local level, this program has included union member activists in as many local unions as possible who provide information to other members and engage them in political action. We have sought especially to develop and maintain this field structure in states and districts where the electoral environment is most competitive; where union membership is most concentrated; where unions have greatest organizational strength; and where the AFL-CIO and its affiliates identify and participate in key elections involving candidates and ballot measures. That is because the presence of each of these elements enhances the impact and influence of our efforts.

9. The AFL-CIO regularly communicates with union members and their family members in order to engage them on issues, register them as voters, encourage them to vote in federal, state and local elections, and recommend their support of candidates who are committed to supporting working family issues. The AFL-CIO communicates where candidates stand on workplace issues, and, on the basis of their positions and commitments, the AFL-CIO often advocates the election or defeat of specific candidates. The AFL-CIO often prepares and disseminates sample ballots and slate cards that urge its members and their families to support specific candidates. The AFL-CIO also mobilizes union households to defeat anti-union and anti-worker ballot measures in the states, and to support ballot measures that would advance working family interests. These communications are disseminated by numerous means, principally including worksite conversations and leaflets, mailings, telephone banks, door-to- [5] door visits and union meetings. The AFL-CIO has also provided buttons and bumper stickers for its members in support of or opposition to specific candidates and ballot measures, and concerning particular issues.

10. The AFL-CIO has also undertaken a long-term effort to recruit union members to become candidates for public office at all levels. Originally called "2000 in 2000" (to express the goal of electing 2,000 union members by the year 2000), this program is now called "Target 5000" and expresses the labor movement's goal of electing 5,000 public officials with union backgrounds in the next few years.

11. The AFL-CIO supplements all these efforts with non-partisan voter registration and get-out-the-vote activities, particularly in minority communities, usually

through grants to organizations that undertake these activities.

12. The Political Department periodically contracts for polls and so-called "focus groups" to gauge how union members, their families and the general public feel about various issues and candidates, and to develop membership communications that are effective, and that will encourage AFL-CIO members to participate in the political process and support pro-working family candidates.

13. As required by FECA, the AFL-CIO reports to the Federal Election Commission ("FEC") the amount of direct expenditures for membership communications that are primarily devoted to the express advocacy of the election or defeat of clearly identified candidates for federal office. For example, the AFL-CIO expended approximately $4,220,679 for these membership communications during the 1999-2000 election cycle.

14. The principles and components of the AFL-CIO's "Labor '96" effort are described in various contemporaneous documents, including two resolutions adopted by the [6] AFL-CIO Executive Council on February 21, 1996, "Informing and Involving Union Members in National Legislative Debates" (Exhibit 1, 19151-53) and "Reclaim America" (Exh. 2, 19154); and two resolutions adopted by the AFL-CIO Special Convention on March 25, 1996, which approved a special assessment on all AFL-CIO affiliates to fund the "Labor '96" effort; "1996 AFL-CIO Issue-based Grassroots Legislative and Political Program" (Exh. 4, 17989) and "1996 AFL-CIO Principles for Political Endorsements" (Exh. 5, 17990-91).

15. On November 19, 1996, shortly after the general election, AFL-CIO President Sweeney gave a speech that reviewed the AFL-CIO's progress during his first year in office, including Labor '96. (Exh. 6, 19770-76). An AFL-CIO document that summarizes the 1996 election results and the labor movement's role in that election is "Labor '96: Key Facts on 1996 Election Results." (Exh. 7, 19231-37.)

16. AFL-CIO documents during the 1998 election cycle that describe the evolution of the membership mobilization program in the context of the labor movement's policy and programmatic objectives include the "Executive Council Report" to the AFL-CIO September 1997 Convention (Exh. 8, 18544-18559); a resolution adopted by that convention, "Making Government Work For Working Families" (Exh. 9, 18566-67); and a March 19, 1998 Executive Council resolution, "1998 Membership Mobilization" (Exh. 10, 19149-50).

17. AFL-CIO documents during the 2000 election cycle that describe the evolution of our membership mobilization program in the context of the labor movement's policy and programmatic objectives include a February 1999 "Report to the AFL-CIO Executive Council" on Labor 2000 (Exh. 11, 17291-17302); the "Executive Council Report" to the October 1999 AFL-CIO Convention (Exh. 12, 18600-18621); and a resolution adopted by that convention, "Making Government Work for Working Families" (Exh. 13, 18627-28). The AFL-CIO [7] summarized the labor movement's role in the 2000 election in a November 8. 2000 press release, "In the 'Cliffhanger' Presidential Election, Massive Mobilization and High Turnout by Union Members Made the Difference in Key States." (Exh. 14, 20136-37).

AFL-CIO Separate Segregated Funds for Political Uses

18. The Political Department administers the AFL-CIO's principal federal political action committee, the AFL-CIO Committee on Political Education Political Contributions Committee ("COPE PCC").

19. COPE PCC is a separate segregated fund consisting of so-called "hard money," that is, funds voluntarily contributed by individuals subject to the $5,000/year limit imposed by the Federal Election Campaign Act ("FECA"). COPE PCC is registered with the Federal Election Commission ("FEC") as a multi-candidate political committee and is regulated by Section 527 of the Internal Revenue Code. COPE PCC funds are almost entirely expended as contributions to the campaigns of federal candidates who share the AFL-CIO's commitment to working family issues and to political party committees that support such candidates; these funds are also occasionally spent on contributions to state party committees and to pay expenses for some AFL-CIO and AFL-CIO state federation employees as delegates to national political party conventions.

20. COPE PCC is funded by two sources. First, it can solicit and receive voluntary contributions from the AFL-CIO's executive and administrative staff, a class of under 200 people. Second, COPE PCC receives transfers from multi-candidate federal political action committees sponsored by seven of the AFL-CIO's 66 national and international union affiliates with which COPE PCC participates in joint fundraising arrangements, under which members of those unions authorize that their voluntary

political contributions may be allocated between their [8] own union's sponsored federal PAC and COPE PCC. These allocation decisions are made by those unions' PACs, not by COPE PCC.

21. COPE PCC files periodic reports with the FEC as FECA requires. In each report, COPE PCC itemizes the contributions and expenditures that it made during the pertinent reporting period, the contributions it received and the identities of the individuals who made them, and its operating expenses. These reports are public documents. Since 1998, COPE PCC's total annual receipts and their sources were as follows:

Year	From Individuals	From Joint Fundraising Arrangements
1998	$132,809	$1,253,000
1999	165,601	459,100
2000	182,652	935,100
2001	158,040	718,500

22. As a practical matter, the AFL-CIO is limited in its ability to raise more money for COPE PCC. The AFL-CIO's executive and administrative staff consists of a finite and static number of salaried employees. Efforts to increase their contributions would be labor-intensive and time-consuming and unlikely to yield much more than is already contributed. It is not feasible to solicit contributions directly from the AFL-CIO's 13 million members whose principal allegiance as political contributors is to the federal PAC of their own union, and the AFL-CIO would be unable to solicit them absent express permission from and cooperation with those unions. Also, in my experience every union considers its PAC funds insufficient to meet its

political contribution goals. For that reason alone it would be extremely difficult to increase the COPE PCC share of receipts in joint fundraising arrangements; and, in my experience, union members do not contribute more when their PAC has a joint fundraising arrangement with the AFL-CIO than they do when there is no such arrangement. [9]

23. COPE PCC historically has not raised enough funds to make all the contributions it would like to make. Union members and staff ordinarily cannot afford to, and very rarely, if ever, contribute even $1,000 to their union's PAC, let alone the current (and unchanged by the Bipartisan Campaign Reform Act (BCRA)) maximum of $5,000 per year. (No individual has contributed as much as $2,000 during any year to COPE PCC during my tenure, and individuals have rarely contributed as much as $1,000.)

24. If the prohibition on union general treasury funding of "electioneering communications" under the BCRA takes effect, the AFL-CIO will be unable to make such communications via COPE PCC because of the current and prospective limited funds available to COPE PCC and the urgent priority to use its funds for contributions to candidates and party committees, as they are the only funds available for the AFL-CIO to make those contributions.

25. COPE PCC can also lawfully finance independent expenditures in connection with elections to federal office, although by choice it has not done so during my tenure as Political Director, with the exception of certain communications on the AFL-CIO website. (An independent expenditure is a communication to the general public, not coordinated with a party or candidate, that expressly

advocates the election or defeat of a candidate.) COPE PCC has no formal policy against making independent expenditures and, resources permitting, could decide to make such expenditures at any time.

26. I understand that the BCRA will require immediate disclosure to the FEC (and so, to the public) of contracts to make and disbursements of $10,000 for independent expenditures. If these provisions require advance disclosure of independent expenditures, this would be a significant deterrent to COPE PCC making independent expenditures because it would lose the impact and value of being able to communicate a public message when, where and how it [10] wishes. This requirement would also invite candidates that the future message would not support to pressure broadcast stations not to carry the message, and generally this would enable candidates and their parties and supporters to anticipate and try to counteract our message even before we can circulate it, significantly undercutting our ability to speak.

27. The AFL-CIO's general treasury funds pay the administrative costs of COPE PCC, as FECA permits. Any restriction on such funding that would involve a requirement that COPE PCC's hard money finance those costs would further exacerbate the limited-resource problem I have described.

28. The AFL-CIO Committee on Political Education-Treasury Fund ("COPE Treasury") is a separate segregated fund that is registered with the Internal Revenue Service ("IRS") under Section 527 of the Internal Revenue Code. COPE Treasury principally makes contributions and expenditures to the non-federal accounts of national party

committees and, if allowed, in connection with state and local elections. As required by law, COPE Treasury regularly reports its contributions and expenditures to the IRS by filing a Political Organization Report of Contributions and Expenditures, Form 8872. These 8872 Forms are public documents. During the 2001 calendar year, COPE Treasury made contributions and expenditures totaling approximately $135,210.

29. COPE Treasury is funded by direct deposits of per capita tax receipts to the AFL-CIO from the general treasuries of its affiliated national and international unions. No AFL-CIO general treasury funds are transferred to COPE Treasury, and no individual solicitation efforts are undertaken by the AFL-CIO on behalf of COPE Treasury.

AFL-CIO Public Issues Media

30. Another vital and ongoing aspect of the AFL-CIO's ongoing efforts to change [11] laws and policies to promote working family-friendly policies is the public issue advocacy that is principally undertaken via broadcast media. That effort has been directed, developed and carried out by the AFL-CIO Public Affairs Department, principally in conjunction with the AFL-CIO Legislative Department. The Political Department played virtually no role in this advertising during the 1996 and 1998 election cycles due to uncertainty about what conduct constituted unlawful "coordination" under FECA. The Political Department is in regular contact with party committees and candidates, and sometimes works with them in undertaking union member mobilization activities. During the 1996 and 1998 cycles we were concerned that any involvement by the Political Department with AFL-CIO broadcast advertising that

referred to officeholders who were candidates or to non-incumbent candidates -- even if the Political Department had no contact with party committees or candidates about that advertising -- might be deemed to constitute "coordination" with them anyway and so be deemed an unlawful contribution to them by the AFL-CIO.

31. We were well aware throughout the 1996 and 1998 cycles that all our efforts were under considerable public and governmental scrutiny. Beginning in February 1996 various Republican Party committees filed a series of complaints against the AFL-CIO with the FEC falsely alleging, among other matters, that our public issue advocacy was unlawfully coordinated with Democratic Party committees and candidates. A lengthy and costly FEC investigation ensued and lasted until July 2000, when the FEC voted to dismiss all the complaints with a single minor exception not involving AFL-CIO public communications.

32. Effective in mid-2000, the AFL-CIO's internal policy regarding Political Department separation from public issues media changed as a result of the August 1999 decision in FEC v. Christian Coalition, 52 F. Supp. 2d 45 (D.D.C.), and the FEC's subsequent rulemaking [12] on coordination issues. In fact, however, during 2000 the Political Department only occasionally conferred with the Public Affairs Department about the development, content and placement of AFL-CIO broadcast advertising, because patterns had been established and because the Political Department was so focused on the membership mobilization program, which required its full attention and involvement.

33. At no time have I, or to my knowledge anyone else in the Political Department, conferred with any candidate

or party committee about prospective AFL-CIO broadcast advertising or sought their advice, suggestions or approval for any such advertising. Over the years I have received occasional telephone calls from candidates or their staff seeking to initiate a request about AFL-CIO advertising. In every instance I have informed the caller that it is inappropriate to have such a conversation and I have taken no steps to satisfy the request, nor have I informed the Public Affairs Department that it was made.

General Observation

34. I do not believe any of the activities I have described in this declaration corrupt or appear to corrupt any federal, state or local candidates or officeholders. The AFL-CIO and its members have important interests that are served through membership communications and other membership activities and through communications with the general public, and the AFL-CIO expends what resources it can on those programs. The AFL-CIO considers that the activities I have described instill in union members and their families, as well as in the public at large, a sense of empowerment and confidence that avenues for pursuing their common interests are available, and that their engagement in public life is both possible and effective.

[13] I declare under penalty of perjury that the foregoing is true and correct. Executed this 3rd day of October 2002.

/s/
Steven Rosenthal

1996 AFL-CIO Issue-based Grassroots Legislative and Political Program

Over the past 20 years, tremendous shifts have taken place in the political, social and economic strata of our country, nearly all of them detrimental to workers and our families.

Taking the low road through a murky deregulated economy, American corporations chose to compete in a new world marketplace by squeezing more productivity from fewer and less well-compensated workers. A succession of conservative occupants of the White House gave away billions of dollars worth of tax breaks to big business and the wealthy. And at every level of government, reactionary, anti-worker politicians seized the levers of authority and began systematically unravelling the cloak of economic and social justice arduously woven over the past 50 years by workers, our unions and our allies.

The result has been one of the largest transfers of power and money in the history of the United States. Over two decades, productivity went up 24 percent, executive compensation increased 360 percent and corporate profits soared. But real earnings for workers declined 12 percent and the number of Americans with health insurance coverage and pensions at work declined dramatically. Over 97 percent of the increase in household incomes went to the richest 20 percent. Today, the top fifth of households in our country get half the nation's income and control 85 percent of the wealth. The rest — 80 percent of all households — split the other half of total income and share 15 percent of the nation's wealth.

Working families are pressured as never before. More family members are working longer hours just to stay even, and parents have less and less time to spend with our children. Loaded with debt and threatened by downsizing, outsourcing and a growing pool of low-wage, no-benefit contingent labor, American workers are frustrated, anxious and angry. If they aren't out of work, they are out of hope, and you don't have to be an economist to realize that's a prescription for disaster in a nation that survives through optimism.

Incredibly, it is against this national backdrop that conservative members of Congress have launched a broad assault against federal laws and agencies which enhance wages and income security, protect worker health and safety, create and improve jobs, and defend the rights of workers to form and join unions:

- Under the guise of "reform," they have targeted Davis-Bacon, the Service Contract Act and the Fair Labor Standards Act, OSHA, MSHA and the National Labor Relations Board for virtual repeal.

- Using as justification a budget deficit they created, they are bent on decreasing funding for Medicare, Medicaid, and federal and postal retiree benefits, while increasing health care costs for the elderly, the disabled and the poor.

- With no pretense at fairness, they want to widen the wage and wealth gap by giving more tax breaks to the wealthy and the giant corporations, while slashing job training, welfare, nutrition, education and housing programs.

- And in order to perpetuate their control over workers and our families, they are determined to cripple worker organizations by crippling workers' rights, limiting transportation union bargaining rights, denying public access to union organizers, restraining advocacy organizations getting federal funds, legalizing company unions and passing a national right-to-work law.

The AFL-CIO and its unions are equally determined to reverse the flow of money and power that has working families mired in a wage and wealth sinkhole now big enough to swallow our entire economy. And we are committed to countering the politics and policies of elected officials who oppose the interest and welfare of working families. That's why we're responding as never before to rejuvenate our unions and build a strong, new nationwide movement of workers and our families. As the only organizations expressly representing the interest of working Americans, we're organizing an unprecedented effort to educate and mobilize working-class Americans around the issues that affect us and our children's future.

This is an extraordinary moment in our nation's history and the unions of the AFL-CIO have decided to assess themselves $ .15 per member, per month for a 12-month period beginning in May 1996 to fund an extraordinary response. The assessment is not an increase in the amount of dues members pay. Rather, it is an increase in the share of existing union funds devoted to education, training and mobilization to fight for the issues important to those members.

We will use the money to:

- Strengthen local unions, state federations and central labor councils by providing increased training, coordination and staff.

- Create standing grassroots action committees in every Congressional district, with a goal of recruiting and training at least 10,000 activists.

- Establish a National Labor Political Training Center to train staff as well as rank-and-file organizers and coordinators.

- Employ new techniques of advertising, direct mail and free media to educate workers and their families and motivate them to lobby elected officials.

- Register and mobilize voters around worker issues and get them to the polls in record numbers.

- Judge candidates by their positions on issues, not by whether they are Democrats or Republicans or Independents, and hold them accountable once we have elected them.

ROSENTHAL EXHIBIT 4

AFL-CIO 17989
COUNSEL ONLY

BEST AVAILABLE COPY

1998 MEMBERSHIP MOBILIZATION

In 1996, the AFL-CIO committed itself to an historic legislative and political program d to "reverse the flow of money and power that has working families mired in a wage and sinkhole now big enough to swallow our entire economy" and to counter "the politics and of elected officials who oppose the interests and welfare of working families."

Because of an unprecedented effort by our international unions, state labor federations, abor councils and local unions, the slopes of that sinkhole are today far less slippery. ause of the commitment and dedication of tens of thousands of union activists across our those elected officials have turned their politics and policies a measurable number of back towards working families who elect them.

At our national level, we shredded the right wing's specious "Contract With America" led off attacks on federal health and safety and wage standards that workers and their depend upon.

We defeated an insidious attempt to slash Medicare, student loans and environmental ment, and to raid pension funds to pay for a tax cut for the wealthy.

And against all odds, we raised the minimum wage, lowered a boom on comp time and M Act, and derailed the Administration's proposal for a renewed "fast track" authority in ng foreign trade agreements.

What we've done over the past two years is indeed remarkable -- but it is only a g -- and much more is going to be demanded of the union movement.

A series of "Working Family Issues Forums" sponsored by the AFL-CIO in dozens of ion members and their families are telling us to revive and redouble our efforts to make ealth care available and affordable to all, strengthen Social Security and expand pension ensure fair wages and raise the minimum wage and, most importantly, restore the right s to organize.

ow we face new challenges to the voices of America's working families -- a phalanx of "paycheck protection" measures in Congress and in dozens of states by right-wing, er, anti-union organizations and individuals dead-set on retribution against the for our effective legislative and political efforts.

a result of our success over the last two years, the AFL-CIO and its affiliated unions ed that engaging the enemies of working families in open combat is a win-win national and political strategy.

ROSENTHAL EXHIBIT 10

AFL-CIO 19149
COUNSEL ONLY

Membership Mobilization

We have also learned that we must broaden our strategy beyond debate in the nation's
l if we are to fully restore respect for working Americans and the jobs they do. Therefore,
8 and the years beyond, our primary emphasis in legislative and political activity will be to
nd regularly exercise the grassroots power of our membership to hold elected officials at
els accountable to working family issues and concerns.

To that end, we will:

Hold issues forums around the country, asking our members to help us build a consensus around a Working Families Agenda in which we will push for legislative solutions and measure the positions and records of officeholders.

Increase the size and scope of our legislative and political education campaign efforts, sharply focusing on grassroots membership mobilization.

Build on labor's effective fast track grassroots mobilization effort by utilizing highly-sophisticated direct mail and telemarketing techniques to augment our proven paid media strategies in educating workers and their families on issues affecting their lives.

Increase participation of our 13 million members and the 40 million members of union households in the electoral and legislative process by providing more and better information on which they may base their decisions and involvement.

Strengthen our grassroots electoral activity by redoubling -- from 135 to 300 -- the number of full-time political coordinators in the field working to provide information to our members to get them involved in elections and get them out to vote.

Broaden our focus to include mobilization for political involvement at more levels -- in state legislative, gubernatorial, federal House and Senate, and local elections.

Register 4 million new voters from union households by the year 2000 and by the same year have 2000 highly-trained union-member candidates running for public office at various levels.

###

AFL-CIO 19150
COUNSEL ONLY

DECLARATION OF SENATOR WARREN RUDMAN

[DEV 8, Tab 32]

The affiant, having been duly sworn, deposes and says:

1. My name is Warren Rudman.

2. I have worked in politics for much of my life. I have extensive experience as an elected official and as a public citizen with the workings of the electoral process at both the state and the federal level. In particular, I have deep experience with political fundraising, and I know first-hand and from working with colleagues just how beholden elected officials and their parties can become to those who contribute to their campaigns and to their party's coffers.

3. I first held public office in 1970, when I was appointed Attorney General of New Hampshire. In 1980, I was elected to the United States Senate from New Hampshire. I served two terms and retired from the Senate in 1992. While I was a Senator, I served as Vice Chairman of the Senate Select Committee investigating arms transfers to Iran. I was also a member and the Chairman of the Senate Ethics Committee. Since 1992, I have practiced law in Washington, D.C. During that time, I became a founding member of the Concord Coalition, a [2] non-profit group dedicated to increasing public awareness of national fiscal affairs and was co-chairman of John McCain's presidential campaign. In addition to serving on various Boards of Trustees, I am also member of the Senior Advisory Committee of the Institute of Politics of the John F. Kennedy School of Government at Harvard.

4. As a member of the Senate Select Committee in 1989, I presided over the so-called "Keating Five" hearings. The Committee investigated and reported on aspects of the savings-and-loan scandal. In particular, our report discussed how political contributions to political candidates, national and state parties, and non-profit groups involved in elections, necessitated by the then-current system of campaign finance,

created an aura of corruption that called into question the legitimacy of actions taken by certain elected and appointed officials. One of the "Keating Five" was John McCain, who went on to fight for campaign finance reform in a long and powerful crusade that resulted in the passage of the Bipartisan Campaign Finance Act (or "BCRA") in March, 2002. I greatly admire my friend John McCain for learning from the Keating Five incident that even the appearance of impropriety can be damaging to our democracy.

5. No one should have any idyllic illusions about the role of money in politics. By and large, the business world, including corporations and unions, gives money to political parties for a combination of two reasons: they believe that large contributions to a party (or, in some cases, to both major parties) will enable them to gain privileged access to and special influence over elected and appointed government officials so they can affect government decisions in Washington that affect their interests; and they believe that if they decline solicitations for such contributions, elected and appointed officials will ignore their views or, worse, that competing business interests who do make large contributions to the party in question will have an [3] advantage in influencing legislation or other government decisions. The same is true in the preponderance of cases where wealthy individuals give $50,000, $100,000, $250,000, or even more to political parties in soft money donations.

6. Nor should anyone have illusions about the solicitation side of the process. Much of the soft money raised for political parties is raised by elected officials—sitting members of the Senate and the House of Representatives. For example, the members of the National Republican Senatorial Committee (as well as the members of the Democratic Senatorial Campaign Committee) who raise large amounts of money are all sitting Senators. These and other elected officials solicit large sums of money from businesses, unions, and wealthy individuals who have

legislative matters pending before the Senate and the House. And make no mistake about it, elected officials who raise money for their party committees know exactly why most corporations, unions, and wealthy individuals contribute large sums of money to the party—they know it is exactly for the reasons outlined in the previous paragraph.

7. Special interests who give large amounts of soft money to political parties do in fact achieve their objectives. They do get special access. Sitting Senators and House Members have limited amounts of time, but they make time available in their schedules to meet with representatives of business and unions and wealthy individuals who gave large sums to their parties. These are not idle chit-chats about the philosophy of democracy. In these meetings, these special interests, often accompanied by lobbyists, press elected officials—nators who either raised money from the special interest in question or who benefit directly or indirectly from their contributions to the Senator's party -- to adopt their position on a matter of interest to them. Senators are pressed by their benefactors to introduce legislation, to amend legislation, to block legislation, and to vote on legislation in a certain way. No one says: "We gave money so [4] you should do this to help us." No one needs to say it -- it is perfectly understood by all participants in every such meeting.

8. Individuals on both sides of the table recognize that larger donations effectively "purchase" greater benefits for donors. Larger donors receive greater access to elected officials. Some large donors will ask for help with personal causes, such as immigration matters, tax reform, or political appointments. Others attend meetings with elected officials in order to voice their company or industry's concerns with particular legislation and to affect the outcome of the legislation. These are not the requests or expectations of an average taxpayer. Elected officials may not intend to be affected by such access, but the fact is that they receive a disproportionate amount of input and advice from larger,

more wealthy contributors. This can skew their judgment. Equally important, the assumption that more money buys more influence gravely affects the public perception of the political process.

9. Large soft money contributions in fact distort the legislative process. They affect what gets done and how it gets done. They affect whom Senators and House members see, whom they spend their time with, what input they get, and -- make no mistake about it -- this money affects outcomes as well.

10. I understand that those who opposed passage of the Bipartisan Campaign Reform Act, and those who now challenge its constitutionality in Court, dare elected officials to point to specific interests of quid pro quo corruption. I think this misses the point altogether. What I described in the preceding paragraphs is inherently, endemically, and hopelessly corrupting. You can't swim in the ocean without getting wet; you can't be part of this system without getting dirty.[5]

11. Almost every day, the press reports on important public issues that are being considered in Congress. Inevitably, the press draws a connection between an outcome and the amount that interested companies have given in soft money. Within just a few days last April two different national stories illustrated this point. On April 4, the *New York Times* ran an article that linked a recent executive order accelerating review of energy-related projects to a proposed energy bill submitted by the American Gas Association, a large donor to the Republican Party. (Attachment A). On April 6, the *Los Angeles Times* ran an article linking new, voluntary OSHA guidelines on ergonomics to large donors who opposed mandatory regulations. (Attachment B). These articles confirm my conclusion that the system is inherently, endemically, and hopelessly corrupting. Even if a Senator is supporting a position that helps an industry for reasons other than that the industry gave millions to his party, it does not appear that way in the public eye.

12. I understand that some people say that contributions to political parties from corporations, unions, and wealthy individuals of $50,000 or more are not inherently corrupting because they are not given directly to a candidate or his/her campaign committee. This is utter nonsense. The party's involvement does not sterilize the system. Elected officials often raise this money for their parties, sometimes pursuant to fundraising goals party leaders set for them. When party officials raise the money, they offer access to elected officials in return. Elected officials know exactly who the big party contributors are. The parties use soft money to help federal candidates get elected by running so-called "issue ads" funded with soft money in closely contested federal races. The parties also help federal candidates get elected in other ways.

13. The soft money system not only distorts the legislative process, it breeds deep cynicism in the minds of the public. I know this from my own experience in talking to citizens and voters over the years. I also see it reflected in polling results that I review from time to time.[6] For example, an ABC News/Washington Post Poll run in March 2001 asked the question: "Do you think politicians do special favors for people and groups who give them campaign contributions, or not? If 'Yes,' do you think that happens often or only sometimes." A staggering 80% of the respondents answered "Yes --often." Another 13% answered "Yes -sometimes." The total is 93%. If I had been a respondent, I would have been part of that 93%. The result of this poll is completely consistent with what I hear from and know about citizen attitudes. That attitude makes no distinction between contributions to candidate campaigns and contributions to political parties.

14. Make no mistake about the implications of this public attitude: when Americans believe overwhelmingly that their public servants are for sale, democracy is challenged at its roots. Kill the roots and you kill the tree.

15. I frequently speak on college campuses around the country. I almost always meet with students and talk about their attitudes toward the government, about the important issues of the day, and about how government deals with those issues. The palpable cynicism I encounter is widespread and deep. Many young people do not have faith in their government or elected officials. They do not think it is important to vote. They say their vote doesn't count because the government is for sale -- elected officials listen to the special interests, not the ordinary voter.

16. I speak frequently at community events as well. Ordinary citizens in large measure share the cynicism of young students, and for the same reasons.

17. The aura of corruption that surrounds our campaign finance system also deters able, qualified people from running for office. Before the Congress passed the BCRA, I tried to recruit a young, successful New Hampshire businessman to run for Congress. He declined, [7] telling me that he was not interested in large part because of the large amounts of both hard and soft money he would have to raise and everything that raising such enormous sums would entail.

18. As noted, I have been deeply involved in many federal election campaigns, and am therefore familiar with campaign advertising in such campaigns. Based on this experience, I believe that broadcast advertising does not need to use so-called "magic words" like "vote for" or "vote against" to be fully effective in supporting a clearly identified candidate. Many, if not most, campaign ads run by parties and by candidates themselves never use such "magic words." It is unnecessary. Usually the goal of an ad is to convey an image about the candidate's personal qualities and his or her views on important issues, or to contrast the candidate with his opponent. The idea is that if potential voters like the candidate and/or like his opinions, they will be inclined to vote for the candidate. Over the years -- and particularly in the last two election campaigns -- I have seen many, many

ads that in fact promote the election of a candidate that never say "vote for" the candidate. It is consumer fraud in my view for the parties -- and both parties are guilty of this -- to bombard citizens during the campaign season with broadcast ads about the party's candidates, all the while pretending that those ads are solely about "issues" and are not related to the candidates' campaigns. This conduct too breeds an unhealthy cynicism in the electorate, which generally harms our democracy and which specifically undermines the credibility of the major political parties.

19. To curtail soft-money fundraising and giving, it is necessary to have a comprehensive approach that addresses the use of soft money at the state and local party levels as well as at the national party level. The fact is that much of what state and local parties do helps to elect federal candidates. The national parties know it; the candidates know it; the state and local parties know it. If state and local parties can use soft money for activities that affect [8] federal elections, then the problem will not be solved at all. The same enormous incentives to raise the money will exist; the same large contributions by corporations, unions, and wealthy individuals will be made; the federal candidates who benefit from state party use of these funds will know exactly whom their benefactors are; the same degree of beholdenness and obligation will arise; the same distortions on the legislative process will occur; and the same public cynicism will erode the foundations of our democracy -- except it will all be worse in the public's mind because a perceived reform was undercut once again by a loophole that allows big money into the system.

20. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Civ. No. 02-582 (CKK, KLH, RJL)
Consolidated Actions

SENATOR MITCH McCONNELL, et at.,
Plaintiffs,

v.

FEDERAL ELECTION COMMISSION, et al.,
Defendants.

DIRECT TRIAL TESTIMONY OF STEPHEN A. SANDHERR

The Chamber plaintiffs and ABC designated the attached pages 5:16 through 10:6 of the September 30, 2002, deposition of Stephen A. Sandherr as his direct trial testimony.

Respectfully submitted,

Thomas W. Kirby, Bar No. 915231
Wiley Rein & Fielding LLP
1776 K Street NW
Washington, DC 20006
TEL: 202.719.7062
FAX: 202.719.7049

Dated: October 4, 2002 Counsel for the Chamber Plaintiffs and ABC

**CONFIDENTIAL DEPOSITION OF STEPHEN E. SANDHERR
CONDUCTED ON MONDAY, SEPTEMBER 30, 2002**

going to excuse myself for a second and see who is hammering on the door.

I'm going to direct your attention to 1996 and to an organization known as The Coalition. Does that ring a bell with you?

A. Yes, it does.

Q. Was AGC a member of The Coalition?

A. Yes, we were.

Q. How did that come to be?

A. How did The Coalition come to be?

Q. Yes, just in a nutshell.

A. It was very well publicized at the time that the AFL-CIO was -- had raised $35 million to use in the 1996 Congressional elections where it was their intention to unseat pro-business members of Congress, particularly Republicans, and the business community decided that it was in our interest to respond to that by trying to raise our own funds to counter the advocacy ads that the AFL-CIO was announcing that they were going to run in the elections.

Q. And this was Mr. Meeney (sic) who was making these announcements on that; is that right?

A. Sweeney.

Declaration of Representative Christopher Shays

* * *

[4 (11 PCS/ NRA 101)]

13. I personally feel that some of the ads run in 2000 attacking the character of President George W. Bush were inappropriate, including some that insinuated that he is a racist. While these ads may still be run under BCRA, I was very glad that the BCRA passed with a provision that would require the disclosure of all funding for broadcast ads mentioning a candidate for federal office, run within 30 days of a primary and 60 days of a general election.

* * *

DECLARATION OF BEVERLY ANN SHEA

I, Beverly Ann Shea, hereby swear and depose as follows, based on my own personal knowledge:

1. I am the Finance Director for the Republican National Committee ("RNC"). I submit this Declaration to discuss: (a) the RNC's federal and non-federal fundraising programs and donors; (b) the RNC's fundraising and direct financial assistance to state parties; (c) the financial impact of the Bipartisan Campaign Reform Act ("BCRA") on state parties and the RNC; and (d) the faulty supposition that the RNC provides its major donors with improper access to federal officeholders.

[*2] <u>Education and Background in Political Fundraising</u>

2. I have 21 years of experience in professional political fundraising and finance, through positions with the RNC, state political parties, and campaigns for elected office. This experience is summarized in my biographical statement. <u>See</u> RNC Exhibit 2263, attached as Attachment 1 hereto. From February 2001 to the present, I have served as Finance Director for the RNC. Previously, from March 1997 to December 2000, I was Deputy Finance Director for the RNC. In the two month interim period between these positions, I was Chief Deputy and Director of Special Services for the 54th Presidential Inaugural for President George W. Bush.

3. Before March 1997, I had a variety of political fundraising positions. From April 1993 until March 1997, I was President of Shea Consulting. In that position, I served as a fundraising consultant to the campaigns of many candidates for federal and state elected office. For various time periods between June 1981 and April 1993, among other positions, I was: (a) Regional Field Finance Director for the RNC; (b) Finance Director to the Republican Parties of New Mexico and Wisconsin; (c) Campaign Manager for congressional

candidate Michael Brown; and (d) National Finance Director to the Bush-Quayle '92 Primary Committee.

4. I received a Bachelor of Science degree in Journalism from West Virginia University in 1980.

General Description of the RNC's Finance Division

5. The Finance Division is responsible for all fundraising activities of the RNC. The Division is led by the Finance Director, who is chosen by the RNC's Finance Chairman, the Chairman of the RNC, or both. An organizational chart for the Finance Division is RNC Exhibit 2424, and is attached as Attachment 2 hereto.

[*3] 6. The Finance Division is organized into two marketing disciplines: (a) major donor programs, which are those involving contributions of $1,000 and up; and (b) direct marketing, which mostly involves small donations but also can include the RNC's $1,000 and $5,000 donor programs. From 1997 to 2001, the Finance Division had a full-time staff of 40 to 45 employees, not including the RNC's in-house telephone solicitation center.

7. In 2000, the Finance Division raised a total of $252,790,600. See RNC Exhibit 2429, attached as Attachment 3 hereto. Of this amount, $146,929,900 was raised through the RNC's "major donor" programs as described below, and $105,860,700 was raised through direct marketing, which consists of direct mail, telemarketing, and electronic commerce solicitations through email and the internet. Id. This overweighting of major donations is unique to presidential election years. In all other years, direct marketing typically accounts for 60-65% of the RNC's gross income. This return to the norm was borne out in 2001. In that year, the Finance Division raised a total of $82,027,300. Of this amount, $25,909,700 was raised through major donor

programs, and $56,117,600 was raised through direct marketing. See id.

8. In 2000, federal money accounted for 60% of the total raised by the RNC, and the remaining 40% was non-federal money. See RNC Exhibit 535, attached as Attachment 4 hereto. In 2001, the RNC's total funds raised consisted of 78% federal money and 22% non-federal money.

9. The RNC's active donor base in calendar year 2000 was 1,030,666 donors, of whom 435,908 were new first-time contributors. See RNC Exhibit 2430, attached as Attachment 5 hereto. The RNC's donors in 2000 gave 2,470,093 separate donations during the year. Id. The average contribution to the RNC in 2000 was $102.34. Id. The RNC's active donor base in calendar year 2001 was 794,682 donors, of whom 219,135 were new first-time **[*4]** contributors. Id. The RNC's donors in 2001 gave 1,437,370 separate donations during the year. Id. In 2001, the average contribution to the RNC was $57.07. Id.

The RNC's Donor Programs

10. The Federal Election Campaign Act of 1971, as amended, allows individuals to contribute up to $20,000 per year to the RNC, and limits to $25,000 an individual's total annual federal contributions to all recipients. Federal law allows multi-candidate political committees ("PACs") to contribute up to $15,000 annually to the RNC. These federal contributions are deposited into the RNC's federal accounts.

11. I understand that the BCRA will increase to $25,000 the annual limit on an individual's federal contributions to political parties such as the RNC, and will increase to $57,500 the aggregate limit on an individual's total federal contributions. The new federal limit regarding political party contributions will not produce much additional fundraising revenue for the RNC because it will affect, at

most, only those 145 donors who presently contribute the current $20,000 federal limit, and perhaps other donors who contribute the $25,000 annual aggregate limit for federal money. Moreover, it is unclear how many, if any, of these donors will increase their contributions to the RNC as a result of the increased political party and aggregate limits.

12. The RNC also receives donations from sources that may not contribute to federal campaign activity, and also receives donations in amounts above the federal contribution limits. Donations from individuals above the federal limits, as well as donations from corporations, labor unions, and other sources that may not make federal contributions, are deposited into non-federal accounts. Of the non-federal funds donated to the RNC in calendar year 2000, for example, 58% were from individuals and 42% were from corporations and PACs. **[*5]** The RNC's non-federal accounts are maintained within the Republican National State Elections Committee ("RNSEC"). The BCRA will prohibit the RNC from raising, spending, transferring, or directing any non-federal money.

13. In 2000, the RNC voluntarily instituted a limit on the amount of non-federal money it would accept from a single individual or corporate donor during a given year. That limit was $250,000. On a handful of occasions in 2000, a donor offered a donation in excess of this voluntary limit and the RNC refunded the excess money. An internal RNC memorandum about one such refund is RNC Exhibit 636, attached as Attachment 6 hereto. Additional refunds of sums contributed above $250,000 in calendar year 2000 were made to The Kohler Company, Philip Morris Company, Mr. Sam Fox, and Mr. Michael Armstrong. Incidental fees paid by $250,000 donors for attendance at the Republican National Convention or similar events were not refunded.

14. The RNC raises federal and non-federal money through a variety of donor programs, as follows:

a. The "Sustaining Member" program seeks individual contributions of at least $25 per year to the RNC. Sustaining Members receive a subscription to the RNC magazine Rising Tide, access to a toll-free Members' Hotline and a members-only internet website, membership commemorative materials, access to the RNC "Museum," and members-only events hosted by the RNC's internet website, www.RNC.org. See RNC Exhibit 35a, attached as Attachment 7 hereto. In 2000, the RNC had 1,002,309 Sustaining Members and other donors who contributed less than $1,000 apiece, for a total of $ 95.65 million to the RNC, $94 million of which was federal money and $1.65 million of which was non-federal.

[*6] b. The "President's Club" is a fundraising program designed for contributions of $1,000 per person or $2,000 per couple, per year, to the RNC. Members of the President's Club are invited to an annual National Meeting featuring federal officeholders, and receive a special members-only newsletter and membership commemorative materials. See RNC Exhibit 35b, attached as Attachment 8 hereto. In 2000, the RNC had an active base of 5,232 President's Club members who contributed a total of $10.1 million to the RNC, $8 million of which was federal and $2.1 million of which was non-federal. See Attachment 4 hereto.

c. The "Chairman's Advisory Board" program requires an annual contribution of $5,000 per year in federal or non-federal money to the RNC or RNSEC. Members of the Chairman's Advisory Board are invited to two meetings held annually that are attended by party leaders. See RNC Exhibit 35c, attached as Attachment 9 hereto. In 2000, the RNC had an active base of 1,440 Chairman's Advisory Board members who contributed a total of $10.8 million to the RNC, $8.1 million of which was federal and $2.7 million of which was non-federal. See Attachment 4 hereto.

d. The "Eagles" program is the RNC's oldest "major donor" program. It requires members to contribute either $15,000 in federal money or $20,000 in non-federal money to the RNC or RNSEC each year. Again, Eagles are invited to many RNC events, including some that feature party leaders. See RNC Exhibit 35d, attached as Attachment 10 hereto. In 2000, the RNC had 1,449 members of the Eagles program who contributed a total of $30.7 million to the RNC, $20.3 million of which was federal and $10.4 million of which was non-federal. See Attachment 4 hereto.

e. The "Majority Fund" is directed at PACs that donate $15,000 per year in federal or non-federal money to the RNC or RNSEC. Members of the Majority Fund are [*7] invited to numerous RNC events, including some events specially designed for members of that group, and some of which feature party leaders. The RNC raises relatively little federal money from PACs, however, because PACs typically use their federal dollars to contribute to candidates. See RNC Exhibit 35e, attached as Attachment 11 hereto. In 2000, the RNC had 120 Majority Fund members that contributed a total of $2.4 million to the RNC, $400,000 of which was federal and $2 million of which was non-federal. See Attachment 4 hereto.

f. "Team 100" members donate $100,000 upon joining, and $25,000 in each of the three subsequent years, to the RNC or RNSEC. These donations typically include a mix of federal and non-federal money. Team 100 members are invited to many RNC events, some of which feature party leaders. See RNC Exhibit 35f, attached as Attachment 12 hereto. In 2000, the RNC had 614 active Team 100 members who contributed a total of $49.6 million to the RNC, $5.4 million of which was federal and $44.2 million of which was non-federal. See Attachment 4 hereto.

g. The "Regents" program asks the donor to give an aggregate amount of $250,000 to the RNC or

RNSEC per each two-year election cycle. Regents members are invited to all events sponsored by the RNC. In 2000, the RNC had 180 active Regents who contributed a total of $34 million to the RNC, $1.5 million of which was federal and $32.5 million of which was non-federal. See Attachment 4 hereto.

15. In addition, the RNC establishes a special "Presidential Trust" program every four years to help raise the funds the RNC is permitted to spend directly on behalf of the Republican nominee for President of the United States, with certain amounts spent on behalf of other candidates for federal office as well. The programs asks the donor to contribute $20,000 in solely federal money, and no portion of the contribution is shared with state parties. [*8] Participation entitles the donor to a one-year membership in the Eagles or Majority Fund program.

16. To ensure strict compliance with federal laws regulating contributions to political party committees, the RNC provides current and prospective major donors with a set of Contribution Guidelines. The Guidelines explain the federal and non-federal RNC accounts and the extent to which contributions may be directed to one, or a combination, of these accounts. RNC Guidelines for the Regents, Team 100, and Majority Fund programs are RNC Exhibits 2155, 2071, and 2097, respectively, and are attached as Attachments 13-15 hereto.

17. I understand that some persons who are unfamiliar with the RNC's fundraising methods believe that Members of Congress regularly solicit donations to RNC major donor programs through telephone calls or personal meetings. Although it is true that Members of Congress occasionally sign fundraising letters for the RNC, it is exceedingly rare for them to solicit funds through telephone calls or personal meetings. As a matter of RNC policy, telephone and personal fundraising contacts for major donor

programs are initiated by RNC Chairman Marc Racicot, Co-Chairman Ann Wagner, Deputy Chairman Jack Oliver, National Finance Chair Lew Eisenberg, and myself, not Members of Congress.

18. Contributions toward the Sustaining Member, President's Club, and Chairman's Advisory Board programs consist of federal dollars. So do many of the contributions to the Majority Fund and Eagles programs. Further, many (if not most) members of the Team 100 and Regents programs fulfill their obligations with a combination of federal and non-federal dollars. Indeed, contrary to popular misimpression, the RNC's major donor programs ($1,000 and up) are a significant source of federal money. In 2000, for example, the funds raised through these programs were 32% federal money and 68% non-federal money.

[*9] Financial Impact of the BCRA on the RNC

19. Based on my personal experience in the RNC Finance Division, I calculate that the BCRA will cause the RNC to lose revenues of approximately $48.5 million per non-presidential election year, and $125 million per presidential election year. These losses will be caused almost entirely by the BCRA's prohibitions on the solicitation or raising of non-federal funds by national political parties. My experience demonstrates to me, contrary to the supposition of uninformed observers, that the RNC will not be able to recoup these lost non-federal revenues merely because the BCRA has increased the limits on contributions of federal money. As noted above, the new federal limit regarding political party contributions will affect only those 145 donors who presently contribute the current $20,000 federal limit, and those who have made aggregate federal contributions of $25,000. Moreover, it is unlikely that the RNC will be able to raise more federal money from lower-dollar contributors than it currently does, for the following reasons.

20. The RNC solicits participation in its donor programs through several methods: (a) soliciting donors to become first-time members in a major donor program; (b) soliciting existing major donors to renew their commitments; and (c) soliciting existing major donors to "upgrade" from lower dollar level programs to higher dollar level programs.

21. The amount of federal money the RNC is able to raise through its major donor programs, in particular, is limited by demographic, economic, and political constraints. For example, most individuals, corporations, and PACs participate in the RNC's major donor programs because the individuals or individual decisionmakers at corporations and PACs are philosophically compatible with the positions of the Republican Party. The number of such individuals who possess the financial resources to participate personally in the RNC's major **[*10]** donor programs -- or who are in a position to direct corporate or PAC participation in those programs -- is a very small fraction of the roughly 4.5 million individuals that comprise the RNC's base of potential donors at all levels. As noted above, although the RNC had a total of 1,030,666 donors in calendar year 2000, only 180 were Regents, 614 were Team 100 members, and 120 were Majority Fund participants. Also, the RNC's perceived political successes and failures affect the quantity and intensity of participation in the major donor programs. Finally, economic factors constrain the number of individuals, corporations, and PACs that participate in the RNC's major donor programs and the degree to which they participate.

22. There is a limit to the number of solicitations of new major donors that the RNC can profitably make. The farther from the RNC's base of likely donors that the RNC prospects for new participants in its major donor programs, the lower its yield. Also, there is a limit to the number of attempts that the RNC can reasonably make to renew or upgrade existing major donors to higher dollar level programs. Most major donors decide whether to renew their

participations or upgrade to a higher level on an annual basis. Thus, there is usually only one time during the year for each major donor that the RNC can profitably solicit an existing major donor to renew or upgrade his or her participation. Repeated solicitations to the same major donor risk alienating that donor and limiting the amount of money that the RNC may receive from the donor in the future.

The Motivation of Non-Federal Donors to the RNC

23. In my experience, donors of non-federal money are motivated by the same desires as donors of federal money. I believe there are three basic reasons why individuals and entities donate money to a political party, and the RNC appeals to these motivations in its fundraising activities.

[*11] 24. First, both federal and non-federal donors tend to be strong and loyal supporters of the party. From my discussions and observations over the years, I can safely state that donors to the RNC believe in the Republican Party philosophy of low taxes, limited federal government, strong defense, and high ethical standards for public officials. From the lowest level donors to the highest level, they share a common interest in politics and good government. Donor belief in the philosophy of the Republican Party is confirmed by their loyalty; for the most part, non-federal donors give money to the RNC regardless of the issues then pending before Congress or the Executive Branch.

25. The second reason that individuals join the RNC's major gift programs is that they enjoy being involved in RNC events, which often include speeches and presentations by prominent policymakers and commentators. The RNC expends much effort and money planning and holding receptions, dinners, retreats, and seminars for both federal contributors and non-federal donors. During the 1998 election cycle, the RNC spent $10.2 million planning, organizing, and staging major donor events. During the 2000

cycle, the RNC spent $18.5 million, and thus far for the 2002 cycle the RNC has spent $7.5 million. If the RNC did not believe donors were motivated by the opportunity to attend events, it would not expend so much money on them.

26. Although RNC events often "feature" party leaders, these leaders are not exclusively current federal officeholders. For example, this category very frequently includes the RNC Finance Chairman and Political Director, who provide insights on the current political climate. Party leaders also include former Cabinet officials from prior Republican Administrations. At one well-attended Team 100 event in 1998, for example, former Cabinet Secretaries Brent Scowcroft and Elizabeth Dole were featured. Other events have featured **[*12]** National Review writer Kate O'Beirne, author P.J. O'Rourke, and other nationally-known political celebrities.

27. Sitting Members of Congress and Executive Branch officials also are often featured at events for donors, but their roles at these events are commonly misstated by the pro-reform commentators. These officeholders (and candidates forf ederal office)d o not appear at RNC events to solicit either federal or non-federal donations. Rather, they appear to speak on political or policy topics, and the substance of these comments does not differ from comments they frequently make on television or on the House or Senate floor. Nor does the content of their comments differ from events attended primarily by federal contributors to events attended primarily by non-federal donors. Question-and-answer sessions at RNC donor events focus on general policy issues and do not provide an opportunity for any individual to advocate a particular position on pending legislation. Attendees at some events sometimes have the opportunity to socialize, or play golf or tennis, with the speakers, but efforts to lobby during these events are frowned upon as exceedingly rude and are quite rare.

28. Relatedly, participation in the RNC's major donor programs increases during presidential election years, when the RNC typically has more events, especially those centered around the quadrennial Republican National Convention. Major donors receive special invitations to each Convention, and are also invited to participate in special meetings and social occasions during the Convention proceedings. An example of such an invitation for Team 100 members to attend the 2000 Convention, which was held in Philadelphia from July 31-August 3, 2000, is RNC Exhibit 723 and is attached as Attachment 16 hereto. The Conventions also permit the RNC to host special Gala celebrations in honor of the Republican nominees for President and Vice-President. Attendance at such events is available for donations of $1,000 per person, and **[*13]** thus many attendees contribute only federal money to the RNC. A sample Gala invitation from the 2000 Convention is RNC Exhibit 847, and is attached as Attachment 17 hereto. Based on my personal experience, I conclude that participation in major donor programs increases during presidential election years for two basic reasons: (a) donors enjoy attending the unique events that can be made available only in presidential election years; and (b) donors are excited by the fact that so much more is at stake during presidential election years than in any other years.

29. Similarly, involvement in major donor programs also allows donors to meet and become friends with like-minded people in business and politics. Members of Team 100 and the Eagles, for example, tend to be successful entrepreneurs who have much in common. They enjoy the camaraderie of these social occasions and the non-political business opportunities that these associations with other major donors provide.

30. The third reason that individuals participate in the RNC's major donor programs is that they have a sense of philanthropy that often begins with similar commitments to

charitable organizations. Many members of Team 100, for example, are well known for their generosity to charitable causes. Members of RNC major donor programs are comfortable with the notion of giving to causes they support with no expectation of receiving tangible benefits in return.

31. Based upon these and other personal observations, I strongly believe that participants in the RNC's major donor programs do not expect, and do not receive, political favors in exchange for their donations.

[*14] Fundraising Assistance Provided by the RNC To State and Local Parties and Candidates

32. A core function of the RNC is to assist state Republican parties in their activities, including fundraising. The RNC provides this assistance in five major ways, all of which appear to be criminalized by the BCRA to the extent they involve non-federal money.

33. First, the RNC transfers and otherwise provides federal and non-federal funds to state parties (and candidates for state office). I understand that the Declaration of Jay Banning addresses this in more detail.

34. State parties quite obviously benefit from RNC transfers, which represent funds that the state parties might not have otherwise obtained through their own efforts. Further, certain state parties rely heavily on RNC non-federal funds for their very existence.

35. Second, the RNC shares its lists of fundraising prospects with state parties. A sample list-sharing agreement with the Massachusetts Republican State Committee for 2002 is RNC Exhibit 1801, attached as Attachment 18 hereto. As this document states in one of its initial clauses, because it is the "principal responsibility of the RNC to promote Republican candidates," and because "a component part of its

party-building activities is to develop and identify contributors who share common goals and ideals," the list exchange program is "to the mutual advantage and benefit of the parties" thereto. Id. Indeed, state parties benefit greatly from list-sharing because the RNC's fundraising lists are very comprehensive and detailed, and provide solid prospects for donations that state parties might otherwise be unable to obtain on their own. Additional list-sharing agreements with the Republican Party of Ohio, Wisconsin, Tennessee, Iowa, and Indiana are RNC Exhibits 1195, 933, 1001, 911, and 956, respectively, and are attached as Attachments 19-23 hereto.

[*15] 36. Third, the RNC co-hosts "tiered" fundraising events with state parties. "Tiered" fundraising events typically involve two or three separate events occurring on a single date at locations in the same vicinity. Typical tiered events will consist of a large low-dollar event for federal donors to candidates in the first tier, a middle-tier "photo op" event with larger donors, and often a separate top-tier dinner for the event Host Committee. Typically, the proceeds of the large first-tier event go to a candidate for state office, the proceeds of the middle-tier "photo op" go to the state party, and the proceeds of the top-tier dinner go to the RNC. So-called "tiered" fundraising events such as these serve to benefit state parties because they are able to increase their fundraising success through direct association with the RNC. In fact, without the RNC holding an event in the same city and on the same date as the state party event, it would likely be logistically and financially impossible for the state party to convince major-drawing surrogates to be the featured guest at their own event. Further, the RNC has a highly professional and experienced fundraising staff, which many state parties do not. Indeed, some state parties have no fundraising employees at all. Therefore, state parties necessarily benefit from the involvement of RNC personnel in tiered fundraising activities, both because RNC fundraising staffers are highly competent

and because their involvement supplements the efforts of state party personnel.

37. The RNC also promotes state party events to its donors, in an effort to increase the fundraising ability of state parties. For example, since 1992 the Washington State Republican Party has hosted an annual GOP Picnic, often with the support of the King County Republican Party. Attendance at the Picnic has reached as high as 10,000 participants, and the event attracts elected officials from all levels of government, including members of Washington State's congressional delegation, candidates for Governor in gubernatorial election years, and **[*16]** state and local representatives. The RNC promotes the GOP Picnic to its major donors from Washington State, as demonstrated by the Team 100 letter that is RNC Exhibits 942 and 1126, attached as Attachment 24 hereto.

38. Fourth, the RNC has a program called "Finance PLUS," which provides financial incentives for state parties develop and improve their fundraising capacity. Through Finance PLUS, the RNC reimburses state parties for the costs they incur in organizing and hosting their own fundraising events. In my experience, Finance PLUS is an effective means for the RNC to encourage and strengthen state party fundraising.

39. Finally, the RNC permits its Regents and Team 100 members to designate (or "return") portions of their non-federal donations to state parties, and sometimes requests that its major donors make additional contributions to state parties that are in urgent need of funds. For example, in 2000, RNC Regents and Team 100 members designated $10.8 million in non-federal donations to state parties. By way of example, a spreadsheet describing state-by-state Regents transfers in 2000 is RNC Exhibit 663, attached as Attachment 25 hereto. Several letters from Team 100 members, requesting the designation of contributions to state parties in 2000, are RNC

Exhibits 881, 1522, and 1524, attached as Attachments 26-28 hereto.

40. Related to direct fundraising for state parties, the RNC also engages in fundraising on behalf of candidates for state and local office. For example, the RNC has sent direct-mail fundraising letters on behalf of Virginia gubernatorial candidate George Allen, New Jersey gubernatorial candidate Bret Schundler, and St. Paul, Minnesota mayoral candidate Norm Coleman. See RNC Exhibits 1162, 292, and 232, respectively, attached as Attachments 29-31 hereto. Donations made in response to these letters were made directly to the candidates themselves, not to the RNC, and the RNC did not track or otherwise record who among the **[*17]** recipients of the letters actually made contributions. Because contributions to state and local candidates are not federally regulated, the BCRA will prohibit this type of fundraising assistance.

Impact of the BCRA on State Parties

41. Major contributors often donate non-federal funds to the RNC in lieu of state parties. This can be explained by a variety of factors, all of which demonstrate that the RNC has a greater fundraising capacity than state parties do.

a. First, as the official national Republican Party committee, the RNC has a "brand name" and prestige that the state parties, by definition, do not. Prospective donors are much more likely to have heard of the RNC, to consider it accountable and credible, to understand its role in the political process, and to trust that its activities are aligned with the national Republican Party agenda. Further, several state Republican Party organizations are largely inactive, and thus are unable to present compelling reasons for donors to support them.

b. Second, the RNC has a large direct marketing and fundraising staff, consisting, in recent years, of between 40 and 45 employees. All of these personnel are full-time professionals with substantial experience in the field. State parties, in contrast, generally lack professional fundraising staff. The RNC, because it is a well-known national party committee, also tends to attract the most talented and dedicated marketing and fundraising employees. It is more difficult for state parties to do so.

c. Third, the size and scope of the RNC's direct marketing and fundraising operations enable it to achieve economies of scale that state parties simply cannot match. For example, the RNC's cost per mail piece in a nationwide fundraising campaign is substantially lower than the cost per mail piece of a statewide campaign conducted by a state **[*18]** party, because the volume of mailings is so different. The RNC, therefore, can conduct direct market fundraising more cost-effectively than state parties can.

d. Fourth, as a national organization, the RNC is able to "go where the money is" with much greater ease and ability than a state party. For example, under current law, the RNC can hold a fundraiser in New York, then re-distribute that money internally to support a candidate running for state office in Mississippi. The Republican Party of Mississippi, in contrast, is much less likely to have fundraising success in New York. The ability of the RNC to raise funds nationwide is demonstrated by the attached charts that sort the RNC's federal and non-federal contributions by state for 2000 and year-to-date for 2002 (as of June 28). See RNC Exhibits 2259 and 65, respectively, attached as Attachments 32-33 hereto. Both charts show that the RNC raised federal and non-federal money from all 50 states in 2000 and year-to-date in 2002.

e. Finally, as noted above, my experience has demonstrated to me that donors have fairly firm limits on

the amount of money they are willing and able to contribute to political parties. This is a fact of the marketplace that will not change merely because of the BCRA. Because the RNC is so much more prominent than state parties are, my experience suggests that donors are -- and will continue to be -- inclined to allocate more of their contributions to the RNC than to state parties.

42. As described above, the BCRA threatens to outlaw the RNC's fundraising assistance to state parties in the form of joint and tiered fundraising for non-federal money, transfers of non-federal funds, and designation and direction of non-federal funds. Because the state parties have less fundraising capacity than does the RNC, the elimination of RNC assistance with respect to non-federal money would have a significant detrimental effect on state **[*19]** parties. Indeed, it is no exaggeration to observe that the BCRA threatens the very survival of the Republican Party committees in several particularly vulnerable states. I understand that the Declaration of Jay Banning sets forth information about the five most financially vulnerable state Republican Parties, namely those in Arkansas, Maine, North Carolina, Wisconsin, and Oregon.

The RNC Does Not Give Donors Improper Access to Candidates or Officeholders

43. I understand that persons unfamiliar with political fundraising often contend that individuals and entities that donate non-federal money to political parties do so to "buy access" to candidates and officeholders, so that the donor can attempt to achieve improper influence over the legislative process. Based upon my 21 years of experience as a political fundraiser and finance consultant, I categorically reject this contention with respect to the RNC.

44. As a matter of policy, the RNC Finance Division does not offer to arrange personal meetings between

donors -- no matter how large -- and federal officeholders or candidates for office. During my tenure at the RNC, there have been a handful of occasions when individuals have attempted to condition donations on the arrangement of such meetings, and each time the RNC has rejected the donation and denied the request. In one related instance, the RNC rejected a contribution from a prospective Regents member because of public controversy involving his prior illegal contributions to Democratic candidates for federal office and his overnight stays in the Clinton White House as a major Democratic donor. See RNC Exhibit 552, attached as Attachment 34 hereto. The individuals who have sought to condition donations to the RNC on its arrangement of meetings with officeholders, more often than not, have proposed to contribute federal dollars to the RNC. One such recent instance involved a gentleman who proposed to condition his membership in the RNC Eagles program on a meeting **[*20]** with an officeholder. The RNC rejected the contribution. A ban on non-federal contributions to the RNC, therefore, would not stop most of these incidents from occurring.

45. It is obvious why major donors to the RNC do not regularly use their donations as a means to obtain "access." All or virtually all who have personal or organizational business with the federal government retain or employ professional lobbyists. Each election cycle, however, there are a very few instances in which federal or non-federal donors ask the RNC Finance staff or other RNC personnel to arrange meetings with federal officeholders. To confirm my recollection that such requests are very infrequent, I instructed my staff to review the RNC Finance Division's files about all contacts from major donors between 1997 and the end of 2001. These files record all contacts, in the form of letters, telephone calls, or personal meetings, between the RNC Finance Division and each major donor. There are literally thousands of such files, each of which contains multiple entries for each separate donor, with each entry showing the

date and the substance of the contact. Some files contain dozens of entries. This review demonstrated, consistent with my recollection, that on average in recent years the RNC has received fewer than fifteen requests per election cycle in which donors -- of both federal and non-federal money -- ask RNC personnel to arrange meetings with federal officeholders.

46. Such requests come from donors at all levels, and are more prevalent among federal contributors than among non-federal donors. In the relatively infrequent instances in which the RNC Finance staff receives such a request, our policy is to pass the request along to the officeholder's staff without inquiring into the purpose of the proposed meeting, but neither to advocate a meeting nor ascertain whether a meeting has been arranged. In passing along the request, we do not indicate the amount of money donated by the person requesting the meeting. I received one such request, for example, on February 22, 2001, and as a matter of course the **[*21]** request was passed along to the officeholders' staff. See Attachment 35 hereto (defendant-intervenors' exhibit). At no time did I or anyone on my staff advocate that the meeting occur, or follow up on whether it did occur.

47. I understand that the defendants in this case have contended that an employee in the RNC Finance Division's external affairs office, Stephanie Strategos, is employed for the purpose of arranging donor meetings with Members of Congress. The defendants are mistaken. In fact, it is the job of Ms. Strategos to arrange for Members of Congress, Cabinet officials, and other special guests and speakers to attend RNC events, which are attended by scores or even thousands of people.

48. Relatedly, I understand that the defendants have referenced several RNC documents in an effort to support their claim that the RNC provides improper "access"

to its non-federal donors. In fact, none of these documents supports the defendants' claims.

a. First, the defendants point to an internal RNC memorandum dated October 23, 2001, which tracks Presidential appointments of Team 100 members. See Attachment 36 hereto (defendant-intervenors' exhibit). The purpose of the memorandum was to ensure that the RNC would refrain from future solicitations to these Team 100 members, because the RNC as a matter of policy does not solicit funds from Executive Branch officials or nominees.

b. Second, the defendants refer to an RNC memorandum dated May 15, 1995, from Tim Barnes, Director of Team 100, to former U.S. Senator Alphonse D'Amato, informing Senator D'Amato that a particular Team 100 member had designated $25,000 of his membership dues to the New York State Republican Party. See Attachment 37 hereto (defendant-intervenors' exhibit). This memorandum was sent in response to a specific request **[*22]** from Senator D'Amato, in his capacity as Chairman of the National Republican Senatorial Committee and as a leader of the New York State Republican Party, for information about the extent to which RNC members contributed funds to the state party. The RNC did not facilitate any "access" to Senator D'Amato for the individual referenced in the memorandum. Moreover, it is rare for a federal officeholder to inquire about donations or donors, even though this information is publicly available through the FEC.

c. Third, the defendants have identified an RNC memorandum dated October 8, 1999, from Dulce Zahniser to myself and my predecessor Margaret Alexander Parker, which in part references the possibility of fundraising telephone calls to Mississippi residents to be made by Congressman Charles ("Chip") Pickering and U.S. Senate Majority Leader Trent Lott. See Attachment 38 hereto (defendant-intervenors' exhibit). The memorandum makes

clear that neither Congressman Pickering nor Majority Leader Lott had placed any such phone calls and, in fact, to my knowledge they never did. As noted above, it is exceedingly rare for Members of Congress or Senators to place RNC fundraising phone calls, and this memorandum is not to the contrary.

49. The overwhelming majority of fundraising events sponsored by the RNC include both federal and non-federal donors. In other words, a person does not need to contribute non-federal money to attend an RNC event and meet Republican officeholders and candidates. Even after the BCRA prohibits the RNC from raising non-federal money, I am confident that the RNC will still encourage candidates and officeholders to attend its events. Even today, for example, the RNC invites federal officeholders to attend the twice-yearly meetings of the Chairman's Advisory Board, which consists solely of federal money donors to the RNC.

[*23] 50. In my personal experience and observation, RNC fundraising events do not provide a forum conducive to or appropriate for lobbying. Virtually all of the RNC's events include at least several dozen donors of diverse business and economic interests, and many events are attended by hundreds or thousands of donors. For the most part, donors who attend RNC events receive no more opportunity to interact with officeholders than a brief "photo opportunity." Further, efforts to discuss business, much less to lobby an officeholder, at these events are considered rude and inappropriate. Attendees know that officeholders are uninterested in conducting business during RNC events.

51. Finally, it is a well-known fact that individuals and entities with important business before Congress virtually always hire lobbyists. These lobbyists meet directly with Congressmen, Senators, and their staffs to make presentations and discuss issues. These activities are perfectly appropriate and usually occur during normal business hours. A business

need not donate non-federal money (or contribute any money) to retain an effective lobbyist, and many companies with important business before Congress do not donate non-federal money to either party.

52. The various RNC exhibits attached to this declaration, with the exception of the private letter attached as Attachment 35 hereto, are to the best of my knowledge true and correct copies of records prepared and kept by the RNC in the course of its regularly conducted business activities.

[*24] I declare under penalty of perjury that the foregoing is true and correct.

s/
October 4, 2002 Beverly Ann Shea

[EXHIBITS OMITTED]

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

SENATOR MITCH McCONNELL, et al.,	
Plaintiffs,	Civ. No. 02-582 (CKK, KLH, RJL)
v.	All consolidated cases.
FEDERAL ELECTION COMMISSION, et al.,	**COUNSEL ONLY**
Defendants.	
AMERICAN FEDERATION OF LABOR AND CONGRESS OF INDUSTRIAL ORGANIZATIONS, et al.,	
Plaintiffs,	
v.	
FEDERAL ELECTION COMMISSION, et al.,	
Defendants.	

DECLARATION OF GERALD M. SHEA

Background

1. I have spent most of my working life in various positions with the labor movement. In August 1993, I left the Service Employees International Union, where I had worked since 1972, and accepted what was intended as a

temporary assignment as Director of the Employee Benefits Department of the AFL-CIO. In 1994 I also assumed the position of Executive Assistant to Thomas R. Donahue, the Secretary-Treasurer of the AFL-CIO. In these [2] positions, I was responsible for the AFL-CIO's efforts to obtain national health care reform legislation. When Mr. Donahue became the President of the AFL-CIO in August, 1995, I continued as his Executive Assistant.

2. After John J. Sweeney won election as President of the AFL-CIO on October 25, 1995, I became Assistant to the President for Governmental Affairs, and I have held that position to this day. I am responsible for oversight and coordination of all of the AFL-CIO's policy-related activities, principally including the activities of the Legislative and Public Policy departments, but also dealing regularly with the Public Affairs, Political, Safety and Health, and Civil, Human and Women's Rights departments, and others at the AFL-CIO. Each of these departments is headed by a senior management person who reports directly to the officers of the AFL-CIO, and I am not normally involved in the day-to-day administration of these departments. Instead, my role is to make sure that all of the staff resources within the organization are working effectively and in concert to achieve our policy goals. In particular, this has been my role with respect to the AFL-CIO's broadcast advertising program since Denise Mitchell joined the AFL-CIO as head of the Public Affairs Department in November 1995.

Overview of the Structure and Purposes of the AFL-CIO

3. The AFL-CIO is a national labor federation comprised of 66 national and international labor unions that, collectively, have a total of approximately 13 million

members, who are also members of the AFL-CIO. These members work, and are represented for purposes of collective bargaining, in thousands of occupations in virtually every industry. The AFL-CIO is a tax-exempt organization under Section 501(c)(5) of the Internal Revenue Code. The AFL-CIO was formed in 1955 by the merger of its two predecessor confederations of unions, the [3] American Federal of Labor and the Congress of Industrial Organizations.

4. The purposes, structure, policies, and programs of AFL-CIO are described in the AFL-CIO Constitution (Exh. 1, 18282-320) and on its website, www.aflcio.org, which is updated regularly. The AFL-CIO's basic purposes, structure, policies and programs remain largely consistent from year-to-year. Since 1995, the AFL-CIO has regularly described four fundamental missions as underlying all of its activities:

a. Organizing all workers into unions so they can achieve dignity and security through common efforts in collective bargaining.

b. Providing an effective political voice to workers on public issues that affect their lives and fighting for an agenda for working families at all levels of government.

c. Establishing unions as an active force for workers in America's communities, in alliance with other organizations.

d. Enabling workers to influence the global economy by expanding their and their unions' roles in

corporate decisions that affect their working lives and in the international marketplace.

5. The AFL-CIO's highest governing body is its convention, which is comprised of delegates representing its national and international affiliates, state federations and area and central labor bodies. The Convention sets policies and goals for the labor movement and elects the AFL-CIO's officers -- the President, Secretary-Treasurer and Executive Vice President (full-time executive officers) and 51 Vice Presidents (typically, chief officers of AFL-CIO affiliates). These officers comprise the AFL-CIO Executive Council, which meets periodically during the year and is the AFL-CIO's highest governing body between conventions. Since 1955 the [4] AFL-CIO Convention has met every two years; the 2001 Convention amended the AFL-CIO Constitution to make this interval four years, so the next convention will take place in 2005.

6. The AFL-CIO also includes 51 state labor federations that coordinate with local unions and other labor organizations that affiliate with them and give working families a voice in every state through political, legislative and other activities. These state federations are led by officers and boards elected by delegates from local union affiliates.

7. The AFL-CIO also includes nearly 580 area and central labor councils, which similarly give working families a voice at the county and local level, and which too are led by officers elected by local union affiliates.

8. The day-to-day work of the AFL-CIO is primarily conducted by the following programmatic

departments: Organizing; Field Mobilization; Corporate Affairs; Legislative; Political; Public Policy; Public Affairs; Civil, Human and Women's Rights; International Affairs; Safety and Health; and the Office of the General Counsel.

9. The AFL-CIO also includes trade and industrial departments that coordinate particular activities of affiliated unions arising from their representation of workers in common industries. These departments are governed by their own executive bodies, hold their own conventions and manage and finance their own affairs within the overall framework of the AFL-CIO.

General Financial Information

10. Until 2002 the AFL-CIO operated on a calendar year basis. Since 1998 the AFL-CIO's total annual gross receipts have ranged between $151,972,203 and $175,578,133. These AFL-CIO's receipts primarily consist of "per capita tax" payments from the AFL-CIO's 66 [5] affiliated national and international unions, calculated in accordance with a per-member formula established by the AFL-CIO Constitution. The AFL-CIO receives no membership dues; its members typically pay dues to their local unions. Virtually all the rest of the AFL-CIO's receipts derive from various royalty payments and interest on investments. The AFL-CIO does not solicit individual donations.

11. The AFL-CIO routinely spends from its general treasury to pay for the operational expenses underlying its programmatic initiatives and activities, including rents, mortgages, salaries, maintenance, utilities,

supplies and equipment. For example, its total cash disbursements in 2001 amounted to $164,246,963.

Overview of the AFL-CIO's Public Policy Goals and Programs

12. In this Declaration, I will discuss the overall public policy goals pursued by the AFL-CIO from late 1994 though 2001, including the issues and legislation that were the subject of AFL-CIO broadcast advertising. As a general matter, these policy goals are established by the AFL-CIO Convention, the AFL-CIO Executive Council and the three Executive Officers of the AFL-CIO. Historically, the AFL-CIO has always researched, adopted and promoted policies on a broad and deep range of domestic and foreign policy matters, from its perspective as the coordinating body of the Nation's largest organized and enduring mass movement of people, comprised of many millions of members with daily and strong attachments to their unions. Among innumerable examples, the AFL-CIO and its affiliated unions were among the principal supporters of the 1960's Great Society programs; the establishment of Social Security and Medicare; the development and enactment of the Employee Retirement Income Security Act of 1974; and all the civil rights, women's rights and disability rights legislation enacted since the [6] 1960's.

13. During my tenure since 1993, the AFL-CIO has engaged in substantial policymaking, public advocacy and lobbying in Congress and before the Executive Branch on such issues as health care; trade and industrial policy; tax fairness; budget priorities; Social Security and retirement protection; Medicare; wage and hour and workplace safety standards; civil rights; immigration; and campaign finance

and election reform. Virtually all of these issues are perpetually the subject of popular debate, prospective legislation and regulation and enforcement policy by the Federal government.

14. The AFL-CIO has also always researched, developed and promoted policies that have a more union-institutional focus, or that otherwise arise more specifically from the nature and role of unions, such as the right to organize; labor-management relations; government intervention in labor disputes; and myriad regulations governing the workplace. Some of these issues are less regularly the focus of pending legislation, or are less familiar to the general public, and the AFL-CIO's ability to influence popular opinion is more attenuated, requires longer term strategies and is less conducive to mass communications like broadcast media.

15. The AFL-CIO's policy-related agenda and activities since 1994 are reflected in the Executive Council's and various Executive Officers' reports to the 1995, 1997, 1999 and 2001 conventions, and in many resolutions adopted by those conventions. See "Executive Council Report" (1995) (Exh. 2, 18386-510); "Policy Resolutions Adopted" (1995) (Exh. 3, 18511-43); "Executive Council Report" (1997) (Exh. 4, 18544-59); "Resolutions and Constitutional Amendments Adopted" (1997) (Exh. 5, 18560-99); "Executive Council Report" (1999) (Exh. 6, 18600-21); "Resolutions and Constitutional Amendments Adopted" (1999) (Exh. [7] 7, 18622-68); "Executive Council Report" (2001) (Exh. 8, 18669-723); "Resolutions and Constitutional Amendments Adopted" (2001) (Exh. 9, 18724-88).

16. These policies and activities are also reflected in various resolutions adopted by the Executive Council from 1995 through 2001. These include resolutions addressing federal budget and tax policy (Exh. 10, 19698, 19731-32); Social Security and retirement protection (Exh. 11, 19657-58, 19668-71, 19700-01, 19711-13, 19730); Medicare (Exh. 12, 19714-16); education (Exh. 13, 19702); trade and industrial policy (Exh. 14, 19651-52, 19664, 19703-08, 19719-20, 19736-38); international labor rights (Exh. 15, 19724-25, 19728-29); most-favored-nation status and permanent normal trade relations with China (Exh. 16, 19665, 19699, 19717-18, 19727); and immigration (Exh. 17, 19721-22, 19744-46).

17. The AFL-CIO's federal legislative priorities are also reflected in the annual "scorecards" prepared by the AFL-CIO Legislative Department after each annual congressional session adjourns. These scorecards select a relative handful of significant votes cast each year in the Senate and the House; assign a "right" or "wrong" designation to the "aye" or "no" votes on each; and calculate overall "right" and "wrong" percentages for the votes each Member of Congress. These scorecards reflect the Legislative Department's retrospective judgment regarding the most critical or exemplary votes on issues of importance to the ACL-CIO and the labor movement that were addressed during the previous session. These selections usually include both union-institutional issues that are less familiar to the general public and are relatively non-conducive to public advocacy efforts, as described above, such as the so-called "national right-to-work law" that the Senate defeated in 1996, and more general working family issues that are more publicly familiar and conducive to public advocacy, as described above, such [8] as the minimum wage increase that the Senate approved in 1996.

18. The AFL-CIO legislative scorecards are publicly available and distributed to Senators and Representatives. They are an important means of communicating AFL-CIO priorities and encouraging Members of Congress to be responsive to them. The scorecards for the seven Congressional sessions from 1995 to 2001 are attached. (Exh. 18, 19507-51, 19564-68, 19552-63, 19581-635.)

19. In order to inform the AFL-CIO's policy development and activities, the AFL-CIO both consults closely with its affiliated unions and conducts regular polling and other opinion research to determine which social and economic issues are regarded as important by union members and the general public. For example, in early 1996 the AFL-CIO commissioned two well-known public opinion research organizations, The Mellman Group, Inc. and Peter Hart Research Associates, to conduct ten focus groups and a national telephone survey aimed at determining public attitudes concerning a range of economic issues and the government's role in addressing them. (Exh. 19, 18944-93.)

"Stand Up For America's Working Families" (1995)

20. After President Clinton's health care plan failed consideration in the Fall of 1994, and the Republican Party took control of both Houses of Congress, the AFL-CIO undertook a comprehensive assessment of these events and the AFL-CIO's role in them. One of our conclusions was that union members throughout the country were no longer sufficiently responsive to union efforts to advise them how to vote at election time, and needed to be engaged on issues of importance on a continuous basis. At the same time, we

recognized that the AFL-CIO's old style of seeking to influence Congress primarily through the personal contacts of our [9] officers and legislative staff would no longer work. Instead, we needed to develop a much greater capability to mobilize union members and other workers and their families to respond to legislative issues at the grassroots level.

21. Our analysis of the 1994 events began to manifest itself in the way the AFL-CIO responded to the Republican Congress's attempts throughout 1995 to cut back on numerous benefits and protections of importance to workers and their families. At its February 1995 Executive Council meeting, the AFL-CIO adopted and announced a series of policy statements addressing virtually the entire range of the so-called "Contract With America" being pursued the new congressional majority's legislative agenda, and setting forth "The Needs of Working America." (Exh. 20, 19655-59, 19638-50.) And, rather than relying on traditional Washington-based lobbying, we undertook a major effort to mobilize workers in targeted congressional districts under the rubric "Stand Up For America's Working Families." AFL-CIO field staff and staff from AFL-CIO-affiliated unions were assigned to coordinate meetings with Members of Congress and undertake other local activities to express opposition to the Republican legislative agenda.

22. The AFL-CIO also retained a media and political consulting firm, Greer, Margolis, Mitchell, Burns & Associates, to assist us in developing and disseminating broadcast advertisements that would educate and mobilize the public against various elements of the "Contract with America." Although the AFL-CIO had engaged in issue-related advertising to a limited extent in the past, particularly

in connection with health care reform, our commitment to this form of advocacy increased substantially in 1995.

23. The AFL-CIO's broadcast program began with a flight of television [10] advertisements entitled "Cuts" that discussed attempts by the Republican Congress to cut federal funding for jobs, wages, health and safety, housing for senior citizens, and school lunches. (Exh. 21, 001311). As set forth in a memorandum from our media firm to me (Exh. 22, 001186-1187), the advertisements, which asked viewers to "Stand with Us" in opposing the Republican legislative agenda, were timed to run during the congressional Easter recess in eight media markets serving the districts of nine Republican Members of Congress who the AFL-CIO believed might be susceptible to grassroots lobbying pressure. In May, we ran a flight of similar radio ads targeting five additional Members.

24. In July, the AFL-CIO ran another flight of television and radio advertisements entitled "Sparkler," which also addressed the proposed budget cuts. These advertisements named approximately 14 Members of Congress who had been named in one of the earlier flights. And in August, we ran two flights of advertisements, entitled "Stand" and "Grain," (Exh. 23, 001181) which focused on Republican-led efforts to eliminate health and safety protections for workers in the Departments of Labor and Health and Human Services appropriations bill that passed immediately before the August congressional recess. These advertisements were accompanied by a systematic effort to earn "free" media coverage, including a press conference by AFL-CIO President Thomas Donahue, a satellite media tour and local press conferences. The August advertisements ran in approximately 23 media markets serving 26 Congressional

Districts. A report of our "Stand Up" activities during August 1995, which was prepared under my direction, is attached. (Exh. 24, 19049-19139.)

25. Finally, the "Stand Up" campaign included a concerted effort to focus attention on significant cuts in the Medicare and Medicaid programs proposed by the Republican Congress. [11] In August the AFL-CIO sent a mailing to 250,000 union households in 50 congressional districts. We also provided financial and logistical support for a series of town meetings on the Medicare cuts held by an organization known as "Save Our Security." In October the AFL-CIO worked with an ad hoc coalition of labor and community organizations to facilitate approximately 70 local events to dramatize the impact of the Republican cuts in Medicare and Medicaid. These local events were coordinated with the Democratic Minority Leader, Rep. Richard Gephardt, and numerous Members of Congress and Senators attended them. (Exh. 25, 001639-44.) At the same time, the AFL-CIO ran a flight of radio and television advertisements entitled "Medicare" in approximately 27 congressional districts

The Federal Budget Struggle (1995-1996)

26. The struggle between President Clinton and the Congress over the federal budget came to a head on November 20, 1995, when the House of Representatives approved a budget reconciliation bill that included substantial cuts in federal programs such as Medicare, education and college loans, as well as tax breaks for business and wealthy individuals, and President Clinton immediately indicated that he would veto the House bill. At a press conference on November 22, 1995, AFL-CIO President Sweeney released

the results of a poll commissioned by the AFL-CIO showing that a majority of Americans supported President Clinton and opposed the cuts being pushed by the Republican leadership in Congress. (Exh. 26, 001280-1281, 001286-1288.) In order to encourage President Clinton to hold firm in his opposition to the Republican budget plan and to convince Republican Members of Congress to vote against the plan and in favor of the President's budget, the AFL-CIO initiated a massive grassroots lobbying campaign targeting 55 Members of Congress who had voted for the budget reconciliation bill, including direct mail [12] messages sent to approximately one million union households, telephone banks, local events ranging from press conferences to demonstrations, and an extensive broadcast media program. (Exh. 27, 17348-17353.)

27. On December 8, 1995, President Clinton vetoed the budget reconciliation bill, and, after a period of fruitless negotiations, the Federal government had to be shut down. The budget impasse lasted until early January, when the Republican leadership in the Senate and then the House backed down and agreed to pass a series of temporary funding measures to keep the government operating until January 26, 1996. In order to keep pressure on Congress to reach a satisfactory agreement with the President, the AFL-CIO began a new round of grassroots activities focusing on Republicans who had supported the leadership in its efforts and so-called "Blue Dog" Democrats who were urging the President to compromise further with the Republican leadership. (Exh. 28, 17408-17414.) The AFL-CIO also sponsored another round of television and radio advertisements to support these local efforts.

Labor '96

28. On February 21, 1996, the AFL-CIO Executive Council issued a call to a special convention to be held on March 25, 1996 in Washington, D.C. in order to consider a grassroots legislative and political program for the balance of the year, to approve a special assessment of 15 cents per member per month to help finance this program, and to consider an AFL-CIO endorsement for President and Vice-President in the 1996 election. (Exh. 29, 19142.) The convention approved the assessment and the "Labor 96" legislative, advocacy and political agenda. (Exh. 30, 17989.)

29. The "Labor '96" effort is further described in numerous internal AFL-CIO [13] documents circulated during 1996 to frame and guide AFL-CIO activities and communications, including "Labor '96" (Exh. 31, 19161-62); "Labor '96 Mission Statement" (Exh. 32, 19163-64); "Talking Points on the AFL-CIO's Role in This Election" (Exh. 33, 19205-08); "Working Women Vote Talking Points" (Exh. 34, 19209-10); "Talking Points-Rebuilding the Labor Movement" (Exh. 35, 19211); "Talking Points - the AFL-CIO Ad Campaign" (Exh. 36, 19212); and "Guidelines for AFL-CIO Grassroots Lobbying Activity" (Exh. 37, 19944).

Increasing the Minimum Wage (1996)

30. One of the principal legislative goals of the AFL-CIO in 1996 was the enactment of an increase in the federal minimum wage, which had not changed since 1991. Bills to accomplish an increase had been introduced in intervening Congresses but had not been enacted. On March 28, 1996, the Democratic leadership in the House moved to attach an increase in the minimum wage from $4.25 to $5.15 to legislation raising the federal debt ceiling, but this motion

was defeated on procedural grounds by a vote of 192 to 228, with five Democrats voting against consideration of the increase and only seven Republicans joining 185 Democrats in voting in favor. In the Senate, a minimum wage increase was filibustered, and a vote, also on March 28, to break the filibuster failed by a vote of 55 to 45, with all Democrats and eight Republicans casting votes in favor of bringing the increase to a vote.

31. In response to these actions, the AFL-CIO decided to undertake a number of grassroots lobbying activities aimed at building support for a minimum wage increase and pressuring the Republican leadership to allow a vote to take place. These efforts focused on the April 1996 congressional recess. As described in a memorandum describing these grassroots efforts in detail, 400,000 pieces of direct mail, public events and workplace leafleting took place. [14] (See Exhs. 38 and 39, 17437-17455, 19970.) In addition, as set forth in detail in the Declaration of Denise Mitchell, in April the AFL-CIO sponsored a flight of television and radio advertisements in support of a minimum wage increase.

32. When Congress returned from this recess, a number of Republican House Members introduced their own proposal to increase the minimum wage, but the House voted again on April 25 not to bring the issue up for a vote. Similar votes took place on May 1, May 8 and May 15. During this period, the AFL-CIO continued to organize grassroots lobbying activities and sponsored radio and television advertisements to put pressure on the House leadership to allow a vote. Finally, the House leadership agreed to allow a vote on the increase on May 23. The AFL-CIO responded with several flights of broadcast advertisements targeting

Members who had voted in March against allowing the increase to be considered. As described in a memorandum from the AFL-CIO's Legislative Director, at the time that these advertisements ran the AFL-CIO organized a series of local press events to amplify our advertisements and call attention to the upcoming vote. (Exh. 40, 17468-17497.)

33. On May 23 the House approved the minimum wage increase. As described in a memorandum issued by the AFL-CIO following the vote, at least ten Republicans who had voted in March not to bring up the bill and who had been targeted by the AFL-CIO's advertisements and other lobbying activities voted in favor of the bill. (Exh. 41, 19168-19177.)

34. Attention then turned to the Senate, where Senator Edward M. Kennedy (D-MA) and other Democrats were expected to obtain a floor vote. On July 9, the day of the vote, the AFL-CIO sponsored a lobbying day in Washington, in which local union members visited Senators to urge them to vote for the minimum wage increase and other pro-worker bills due to [15] come up in the near future.

Medicare, Social Security and Tax Fairness

35. Among the major concerns of the AFL-CIO in connection with the fight over the FY 1996 budget were the Republican proposals make drastic cuts in the Medicare and Medicaid programs. Although the proposed cuts were significantly reduced in the final 1996 budget package agreed to by the President and Congress in January, 1996, the Medicare issue resurfaced very soon after Congress reconvened, when the Republican leadership in the House and Senate announced agreement on a budget resolution that

would set the parameters for all funding decisions for FY 1997. Budget resolutions embodying the joint leadership proposal were passed in the House on May 18 and in the Senate on May 23, 1996. (Exh. 42, 17647-48.) These resolutions included cuts of $169 billion over six years in the Medicare program and $72 billion over the same period in Medicaid funding. While the two budget Resolutions were being reconciled in Conference, the AFL-CIO initiated an aggressive lobbying campaign to eliminate or reduce the proposed cuts, including broadcast advertisements that began in June and a series of local press conferences timed to coincide with them. (Exh. 43, 17637-640, 17643, 17647, 17691-693.) As this legislative struggle continued throughout the summer and into September, the AFL-CIO sponsored several additional flights of advertisements, as detailed in the Declaration of Denise Mitchell.

36. In the Fall of 1999, as Congress again debated budget proposals that would have had a major impact on the Social Security and Medicare programs, the AFL-CIO argued that the surplus in these programs should be used to strengthen the Medicare program by providing a prescription drug benefit rather than a tax cut for wealthy individuals. [16]

37. In June of 2000, Congress debated the issue of prescription drugs. While the Senate tabled an amendment that would have provided strong prescription drug coverage, the House passed a bill that failed to guarantee prescription drug benefits to seniors. With the issue remaining on the congressional agenda, the AFL-CIO ran broadcast ads in July and August focusing on House members who had voted for the bill.

Retirement Security

38. Another important issue that emerged from the FY 1996 budget fight was retirement security. A Republican proposal to allow some companies to raid worker's pensions was included in the budget reconciliation bill, although due in part to the AFL-CIO's lobbying it was dropped in the final legislation enacted in January, 1996. After Congress returned, legislation was introduced in the House and Senate to address a similar problem with respect to 401(k) plans, H.R. 3688, the 401(k) Protection Act. As described in a letter from the AFL-CIO's Legislative Director, in August 1996 the AFL-CIO began a lobbying campaign to enact H.R. 3688. (Exh. 44, 19818-19.) In support of this effort, the AFL-CIO sponsored a flight of advertisements supporting enactment of H.R. 3688, as described in the Declaration of Denise Mitchell.

Education

39. After its August 1996 recess, Congress returned to Washington to consider an array of pending legislation. Of paramount importance to the AFL-CIO were the various appropriations bills for the Federal government, including the FY 1997 appropriations for the Department of Education, each of which had to be passed before the new fiscal year began on October 1. As discussed above, the AFL-CIO had been deeply concerned during the 1995 budget [17] stand-off about proposed cuts in college loan programs, which assist children of union members and other working families to attend colleges that they cannot otherwise afford, as well as other education programs. The Republican proposal for FY 1997 again would cut this program. The AFL-CIO supported an amendment to add $3.2 billion to the

budget for education programs. (Exh. 45, 19820.) Ultimately, Congress and the White House agreed on a catch-all appropriations bill that, in the words of the Wall Street Journal, was "heavily weighted toward education programs."

Overtime and FLSA Coverage

40. Although the AFL-CIO was able to achieve an increase in the federal minimum wage during 1996, the minimum wage and overtime protections of the Fair Labor Standards Act ("FLSA") have remained under constant threat from conservative and business interests. For example, the idea of "forced compensatory time" has long been on the legislative agenda and strongly opposed by the AFL-CIO each time it has arisen. In June 1997, after failing to defeat a similar provision in the House, the AFL-CIO was able to generate sufficient opposition through broadcast advertisements and other lobbying activities to prevent consideration in the Senate of S. 4, a compensatory time bill which would have amended the FLSA to permit employers to require their employees to work over 40 hours a week without paying them overtime.

41. When Congress substantially revised the nation's welfare laws in the mid-1990's to require welfare recipients to find gainful employment rather than remain on the welfare rolls, one of the most contentious issues involved the extent to which recipients would have to accept jobs that did not pay at least the minimum wage. The AFL-CIO successfully lobbied against Republican proposals to exclude workfare participants from coverage under the FLSA. As [18] described in an AFL-CIO press release, during 1997, after Republicans in the House of Representatives renewed their efforts to remove welfare recipients from the minimum

wage protections as part of the FY 1998 Budge Reconciliation Bill, we joined with women's, civil rights, church and other groups in successfully opposing this proposal. (Exh. 46, 20016-17.)

Tax Fairness

42. In each of the 1995 and 1996 budget fights, the AFL-CIO opposed Republican proposals to provide various tax benefits to the wealthy while at the same time proposing cuts in federal programs such as Medicare and education. In early 1997, we continued to raise this issue in a series of broadcast advertisements that contrasted Congress's willingness to provide tax subsidies to companies that send jobs overseas with its neglect of crumbling schools in need of repairs. Later in 1997, the tax issue arose again in the context of competing tax proposals offered by the Republican leadership and the White House. The legislative fight came to a head when the House considered H.R. 2014 on June 26, 1997. During the period leading up to this vote, the AFL-CIO lobbied vigorously in opposition to the Republican plan and in support of the President's plan.

43. On September 17, 1998, the issue of tax fairness arose again when the House Ways and Means Committee marked up the Taxpayer Relief Act ("TRA"), a bill that proposed using surpluses in the Social Security Trust Fund to pay for $80 billion worth of tax cuts. The AFL-CIO launched a lobbying campaign to defeat this measure when it came to the floor of the House, including a series of television and radio advertisements before the vote later that month. After the House passed the TRA, we continued lobbying against the proposal in the Senate, which was expected to vote on the bill in early October. In addition,

since the bill would almost [19] certainly have to return to the House for another vote once it was approved in the Senate, we continued running ads in the congressional districts of Members who had voted for the bill the first time.

44. In early 2001, President George W. Bush submitted to Congress a proposal for massive tax cuts. The AFL-CIO joined with over 100 other organizations in the "Fair Taxes for All Coalition" to oppose these tax cuts because they were targeted to the wealthy, rather than working families. The budget resolution passed in the House on March 8, 2001 and in the Senate on May 10, 2001 by a 53-47 vote.

45. In November, 2001, in the aftermath of the September 11 terrorist attacks and the economic recession, the AFL-CIO backed an economic stimulus plan that included relief for workers, including enhanced unemployment insurance benefits. After the House passed a stimulus package that contained massive tax cuts for the rich, the AFL-CIO supported a contrary bill sponsored by Senator Max Baucus (D-MT). On November 14, 2001, the Baucus bill fell nine votes short of the 60 votes needed to force a floor vote. As negotiations continued, the AFL-CIO continued to lobby for elimination of the tax cuts proposed by the President and to provide benefits that would aid working families.

Trade Policies

46. The AFL-CO and its affiliates devoted considerable resources in opposing ratification of the North American Free Trade Agreement (NAFTA) when Congress considered and approved it in 1993. Trade issues have since

been ever-present before Congress, and they have a tremendous impact on domestic manufacturing industries where millions of union members work, and millions more have lost jobs due to what we consider misguided and [20] destructive trade policies. (Exhs. 47 and 48, 20013, 20020.) In May and June, 1997, the AFL-CIO lobbied against so-called "fast track" legislation that would give the President authority to make trade agreements that Congress could only approve or disapprove without amendment. In June 1997, AFL-CIO Secretary-Treasurer Richard L. Trumka testified before the Senate Finance Committee that the AFL-CIO would oppose legislation giving the President so-called "fast track" trade authority if the legislation did not require enforceable labor and environmental standards. That Fall, when Congress was expected to take up the "fast track" legislation, the AFL-CIO organized a vigorous lobbying campaign against the proposal, including extensive broadcast media, and "fast track" was pulled from the legislative agenda in November, shortly before Congress adjourned for the year.

47. In September 1998, the Republican leadership in the House of Representatives scheduled a vote on the "fast-track" legislation, which the AFL-CIO again opposed in a series of broadcast advertisements as well as extensive direct lobbying. The House rejected the proposal on September 25, 1998 by a vote of 243 to 180.

48. In the Fall of 1999, the AFL-CIO participated as part of a coalition of consumer, citizens, labor and other groups in protesting the secretive and regressive policies of the World Trade Organization.

49. In the Spring of 2000, Congress took up President Clinton's proposal to provide permanent normalized trade relations with China, a proposal that the AFL-CIO had long opposed. In addition to numerous grassroots lobbying events involving union members, throughout the months of February through June 2000 the AFL-CIO ran a series of flights of television and radio advertisements urging Senators and Representatives in both parties to vote [21] against the proposal. The House passed the bill in May and the Senate did so in September.

50. In May 2001 President Bush stated his intention to seek fast-track trade authority of the kind defeated in previous Congresses. The AFL-CIO ran flights of advertisements in July, October and December urging Members of Congress to vote against this proposal. On December 6, 2001 the House approved "fast track" by a vote of 215-214.

Patient's Bill of Rights/HMO Reform

51. In the early 1990's, the AFL-CIO was a major supporter of President Clinton's health care reform proposal that died in Congress. The issue of health care reform remained vital but relatively dormant legislatively until the Spring of 1998, when public focus on the excesses of HMOs and other managed care organizations increased. On March 31, 1998, "Patients' Bill of Rights" legislation to reform HMOs was introduced in both the House (H.R. 3605) and the Senate (S. 1890), and the AFL-CIO, along with consumer and citizens organizations, began a major grassroots lobbying effort in support of these proposals. In July the AFL-CIO broadcast five flights of advertisements urging Democratic and Republican Members of both Houses to support our

preferred legislation. A version of PBR opposed by the AFL-CIO passed the House on July 24, 1998, and Republicans in the Senate subsequently announced their support of a significantly weakened version of the PBR (S. 2330). In September this bill was scheduled for a vote, and in response the AFL-CIO and its coalition partners began a grassroots lobbying campaign, including significant broadcast media, aimed at defeating S. 2330 or forcing the bill to be removed from the Senate calendar. These efforts were successful and the bill died.

52. When the Senate again considered PBR in July 1999, the AFL-CIO continued to lobby in support of a bill (S. 6) proposed by Senators Thomas Daschle (D-SD) and Edward [22] Kennedy (D-MA), and in opposition to a weaker Republican bill (S. 326), and ran a flight of television ads calling on various Senators to take the right side. The Senate passed S. 1344 (formerly S. 326) by a vote of 53-47 on July 15, 1999. Later in the year, on the House side, the AFL-CIO pushed for passage of H.R. 2723, the bi-partisan Patients' Bill of Rights sponsored by Representatives Charles Norwood (R-GA) and John Dingell (D-MI), which passed on October 7, 1999 by a vote of 217-209.

53. In the Summer of 2000, the two different versions of the Patients' Bill of Rights that passed in 1999 were mired in conference. Senator Don Nickles (R-OK), who chaired the conference committee, refused to accept provisions from the stronger House-passed bill. In response, the Democratic leadership in the Senate pushed for a vote on the House-passed Norwood-Dingell legislation on June 8, 2000 in the form of an amendment to the Defense authorization bill, but the motion was tabled. The AFL-CIO continued to conduct grassroots lobbying, broadcast and

direct lobbying activities aimed at passing the stronger Norwood-Dingell bill, but the legislation died in conference.

Workplace Health and Safety

54. The AFL-CIO was one of the principal supporters of the Occupational Health and Safety Act of 1970, which created the Occupational Health and Safety Administration ("OSHA"). Over the years, the AFL-CIO's Safety and Health and Legislative departments have lobbied OSHA to adopt a broad range of strong regulatory protections for workers and to enforce its regulations aggressively. We have also appeared in numerous federal court cases to challenge the failure of OSHA to act in accordance with the legislative mandate or where business interests have challenged regulations that we supported. [23]

55. During 1995 the AFL-CIO vigorously opposed threatened cutbacks in workplace health and safety enforcement, and ran broadcast ads during April, August and September calling on the public to do so as well.

56. In June 2000, with OSHA prepared to promulgate an ergonomics standard concerning repetitive motion injuries that was supported by the AFL-CIO, the House Appropriations Committee adopted and attached a rider to H.R. 4577 that prevented the regulation from moving forward. The AFL-CIO conducted a number of lobbying activities aimed at defeating this rider. On June 8, 2000, the House of Representatives rejected House Amendment 760 to H.R. 4577, which would have stripped the rider from the bill by a vote of 203-220, with all but 19 Republicans voting for the amendment. The Senate adopted an amendment to FY 2001 Labor-HHS Appropriations bill to prohibit OSHA from

issuing the regulations by a vote of 57-41 on June 22, 2000. With President Clinton threatening to veto the Labor-HHS appropriations bill due to the blockage of the ergonomics standard, the AFL-CIO ran television advertisements in September naming 14 Members of Congress who had supported the amendment repealing the ergonomics regulation.

Coordination With Members of Congress Concerning Legislative Activities

57. The AFL-CIO Legislative Department includes ten lobbyists who regularly meet and converse with Members of Congress and their staffs on a host of issues, such as those I have described above. Other AFL-CIO staff, and the AFL-CIO's Executive Officers, also often meet and converse with Members in coordination with the Legislative Department. The AFL-CIO's efforts to enact or defeat particular legislation regularly include coalition efforts with like-minded groups and organizations, and efforts to influence public opinion in favor of our legislative goals. [24] It is routine and necessary to work as closely as we can with congressional proponents of our positions in order to devise and carry out a legislative and public advocacy strategy that will succeed. Meanwhile, virtually every Member of Congress is a candidate for reelection at all times, and as a practical and unavoidable reality any legislative contact or action provides someone with potential fodder and issues during the next election campaign.

58. Any legal restrictions on the ability of an organization like the AFL-CIO to coordinate legislative and policy communications and activities with federal officeholders who happen to be candidates could

substantially interfere with our ability to maintain ordinary and necessary working relationships with Members of Congress and their staffs.

59. Since 1995 the AFL-CIO has regularly relied upon its contracts with Members and their staffs to gather information and advice about the status and prospects of particular legislation and the positions and considerations of other Members on legislation. We have used that information and evaluated that advice as significant factors in deciding whether or not to run broadcast issue advertising, and in determinating its placement and content.

[25] I declare under penalty of perjury that the foregoing is true and correct. Executed on October 2, 2002.

/s/
GERALD M. SHEA

LABOR '96

THE LABOR '96 PROGRAM: A united labor program to inform labor union members and the general public about the implications of the radical right-wing congressional agenda for working families and to build support for the Federation's legislative proposals which promotes economic opportunity, fairness and security for America's working families.

The Federation will work with a broad range of coalitions who share its legislative objectives and who work to encourage American citizens to register to vote and participate fully in the political process.

WHERE WILL LABOR '96 OPERATE:

Labor '96 will operate in Congressional Districts in all areas of the country.

WHAT ACTIVITIES WILL THE LABOR '96 PROGRAM ENGAGE IN:

The Labor '96 program will be multi-faceted consisting of the following elements:

Grassroots/Mobilization/Education - includes lobbying, letter-writing and phone campaigns, leafleting at worksites and organizing public events, issue education, and phone centers to assist education and mobilization efforts. Each affiliate will conduct internal education programs using phones, mailing, one-on-one communications, etc.

Media - Paid and free media to take the Federation's message directly to the American people.

Voter Registration - Early voter registration making full use of the national Voter Registration Act (Voter Motor Registration).

SHEA EXHIBIT 31

AFL-CIO 19161
COUNSEL ONLY

2

Non-Partisan GOTV - To ensure maximum participation in the November elections.

Intensive Training - A national labor political training center will be established to develop political organizing skills for all staff participants. 3,000 staff and union volunteers will be trained and deployed in the fall GOTV campaign.

State Legislative Issues - The program will target 10 states where we can affect the state legislative process, using substantive analysis of state legislation, grassroots education and mobilization and paid media.

WHO WILL STAFF THE LABOR '96 PROGRAM: Each affiliate will contribute volunteer staff for the implementation of the program.

WHO'S INVOLVED: All affiliates of the AFL-CIO will participate in the program.

Labor '96 will work with a broad coalition of progressive issue organizations and non-partisan voter participation groups such as APALA, LCLAA, CLUW, Operation Big Vote, APRI, CBTU, NCSC and Frontlash to register voters who are normally left out of the process to ensure maximum participation in 1996.

WHEN WILL THE PROGRAM BEGIN: The program's first training session will begin in early March. Staff will be deployed into the field late March.

HOW IS THE LABOR '96 PROGRAM BEING FINANCED: The overall budget for the Labor '96 program is $35 million. These funds will be provided by the Federation and its affiliates. Coalition partners may contribute cash or in-kind services.

The lion's share of this budget - $15-25 million - is targeted for media.

AFL-CIO 19162
COUNSEL ONLY

DECLARATION OF PAUL SIMON

[DEV 9, Tab 37]

1. My name is Paul Simon. I served as a U.S. Senator from Illinois from 1985 to 1997 and represented the 24th and succeeding Congressional Districts of Illinois in the U.S. House of Representatives between 1975-1985. Before being elected to Congress, I was the Lieutenant Governor of Illinois from 1968 until 1972. I also served in the Illinois House of Representatives from 1954 to 1962, and then in the Illinois State Senate until 1966.

2. Since retiring from the U.S. Senate, I have joined the faculty of Southern Illinois University ("SIU"), teaching courses in political science, journalism, and history. I am Director of SIU's Public Policy Institute, a center that provides objective assessments of public policy. I have also engaged in a number of volunteer activities, including co-chairing committees that monitored elections in countries such as Croatia and Liberia, and assisting the efforts of Alliance for Better Campaigns, an organization that advocates for free broadcast air time for candidates and for other reforms that reduce the cost and increase the flow of political communication. I was also appointed by President George W. Bush to the Commission on White House Fellows.[2]

3. Though I no longer hold elected office, I am still in involved in election campaigns. For example, I appear at a few fundraisers and campaign events for Democratic candidates during election years. I am the honorary chair of the campaign for the 2002 Democratic candidate for Illinois Attorney General. I have made a television commercial for Congressman Rod Blagojevich's campaign for Governor. In addition, I try to facilitate events where candidates from both parties are present.

4. While serving in the U.S. House, I made phone calls to raise money for the Democratic Congressional Campaign Committee (DCCC). I also attended their fundraising events,

both in the Washington area and in other cities. After I moved to the U.S. Senate, I did much the same thing, on a larger scale, for the Democratic Senatorial Campaign Committee (DSCC). I have raised both federal or "hard money" contributions and non-federal or "soft money" donations.

5. While some of the party committee events I attended were large affairs, most had 20-25 people and were held in somebody's home. They usually were held for the benefit of a specific Senate campaign as well as for the party committee itself. Each House Member or Senator present would say a few words, as would the Chair of the DCCC or the DSCC, and then we would socialize with the donors. About once a year I attended an all-day conference for major donors where Senators would each speak about legislation we were interested in, and answer questions.

6. Fundraisers today still usually involve about 20-25 people and are held in someone's home. Events where soft money is raised are broadly similar to hard money events, but important differences are that higher amounts are raised from each attendee, the more [3] powerful elected leaders of the party are more likely to be involved, and the events tend to be more exclusive.

7. While I was in Congress, the DCCC and the DSCC would ask Members to make phone calls seeking contributions to the party. They would assign me a list of names, people I had not known previously, and I would just go down the list. I am certain they did this because they found it more effective to have Members make calls. However, my phone manner is rather low key, lower key than the committees like.

8. I tried to avoid asking donors who had previously given to my campaigns to contribute to the party committees, because I didn't want to overdo my welcome. However, I did co-host party fundraising events in Illinois, where invitations were likely sent to my contributors.

9. If this were a DSCC event, the money raised would be credited to Senate candidates based on the DSCC's tally system, both hard and soft money. Donors would be told the money they contributed could be credited to any Senate candidate. The callers would make clear that this was not a direct contribution, but it was fairly close to direct. So contributors would have the sense that this would benefit my campaign, if they contributed to the party.

10. While I don't believe we were given a specific fundraising goal, we knew how much hard money the DSCC could contribute in Illinois, which in my campaigns was a little more than $1,000,000. It was recognized that the closer you came to that with your hard money tally, the more likely you were to get the full $1,000,000. There was also an expectation with respect to the soft money that you raised for the party that some of that money would be spent to help with your campaign.[4]

11. With regard to the Illinois Democratic Party, my own experience was that I more frequently got requests from them for money than the other way around. I sometimes made phone calls for them, or they would request a check for $5,000 to help with get out the vote activities, or a gubernatorial race. I may also have appeared at fundraising events for the State Party.

12. When I last ran for re-election in 1990, some people who had contributed the maximum amount to my campaign then made an additional donation to the Illinois state party thinking that it would help my campaign. However, I generally did not work closely with the State Party on anything, because I never regarded them as major players. This has been true historically in Illinois, although it may be different in other States. It may also be different in Illinois, with regard to state races. But they were not a significant factor in my Senate races. I understand that with the explosion of soft money in the 1990's, the national party committees now transfer significant amounts of soft money

to state parties that are then used to help with federal candidate campaigns.

13. It is not unusual for large contributors to seek legislative favors in exchange for their contributions. A good example of that which stands out in my mind because it was so stark and recent occurred on the next to last day of the 1995-96 legislative session. Federal Express wanted to amend a bill being considered by a Conference Committee, to shift coverage of their truck drivers from the National Labor Relations Act to the Railway Act, which includes airlines, pilots and railroads. This was clearly of benefit to Federal Express, which according to published reports had contributed $1.4 million in the last 2-year cycle to incumbent Members of Congress and almost $1 million in soft money to the political parties.[5]

14. I opposed this in the Democratic Caucus, arguing that even if it was good legislation, it should not be approved without holding a hearing, we should not cave in to special interests. One of my senior colleagues got up and said, "I'm tired of Paul always talking about special interests; we've got to pay attention to who is buttering our bread." I will never forget that. This was a clear example of donors getting their way, not on the merits of the legislation, but just because they had been big contributors. I do not think there is any question that this is the reason it passed.

15. This type of distortion of the legislative process is more likely to occur if large soft money donations are permitted. When people have donated $50,000 or $100,000, they are going to want their pound of flesh after the election. I believe people usually contribute to party committees on both sides of the aisle for the same reason that Federal Express does, because they want favors. There is an expectation that giving to party committees helps you legislatively.

16. Giving to party committees also helps you gain access to Members. While I realize some argue donors don't

buy favors, they buy access. That access is the abuse, and it affects all of us. If I got to a Chicago hotel at midnight, when I was in the Senate, and there were 20 phone calls waiting for me, 19 of them names I didn't recognize and the 20th someone I recognized as a $1,000 donor to my campaign, that is the one person I would call. You feel a sense of gratitude for their support. This is even more true with the prevalence of much larger donations, even if those donations go to party committees. Because few people can afford to give over $20,000 or $25,000 to a party committee, those people who can will receive substantially better access to elected federal leaders than people who can only afford smaller contributions or can not afford to make any contributions. When you increase the amount that people are allowed to give, or let people give without limit to the parties, you increase the danger [6] of unfair access. People who are unemployed or can't pay their hospital bills do not have the same access.

17. The fact that big donors have access gives them a huge leg up in the process. In a very real sense, we are going through the old fight between Thomas Jefferson and Alexander Hamilton: should propertied interests have preference in what goes on in government? And our answer, with our present system of financing campaigns, is yes, people with money are going to be given greater influence, because their names are going to be recognized. They are going to have greater access than those who did not contribute. The soft money system is the most egregious part of the abuse of political contributions resulting in preferred access.

18. I never promised anyone a thing for a campaign contribution. There is a problem, however, when it appears that people are buying influence. Sometimes people who had contributed to my campaign or to the Democratic party at my behest came to see me on a particular bill. Even if I agreed with them on the legislation without regard to the donation they made, it may have appeared to that person and to others

that I was taking the position because they had helped my campaign and my party. The larger the amounts that people are allowed to give, the greater is the appearance that influence has been bought.

19. Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct.

DECLARATION OF ALAN K. SIMPSON

[DEV 9, Tab 38]

1. My name is Alan K. Simpson.

2. I served as a United States Senator from Wyoming from 1979 to 1997. During my time in the Senate, I served as both Assistant Majority Leader and Assistant Minority Leader. After I left the Senate, I directed the Institute of Politics at the Kennedy School of Government at Harvard University from 1998 through 2000. Currently, I teach at the University of Wyoming, practice law, and give speeches across the nation and abroad on current affairs. I am a member of the Presidential Debate Commission, I co-chair the Continuity in Government Commission, and I also sit on a number of corporate and nonprofit boards. Additionally, I was one of the national co-chairman of Project Independence, one of the largest-ever campaign reform movements.

3. During my tenure in the United States Senate, I became acutely aware of the need for campaign finance reform, particularly to remedy the impact of soft money on the political [2] system. I have seen firsthand how the current campaign financing system prostitutes ideas and ideals, demeans democracy, and debases debate.

4. The national parties often ask Senators to make phone calls to raise soft money, and the process is like a boiler room operation. When I was in the Senate, the Republican leadership would take us off Capitol Hill—usually to the Reagan Center—give us a list of heavy hitters, and tell us to make phone calls to get more money from these donors. Sometimes, the party asked us to solicit soft money for attendance at events that included access to the president; other times major donors were given access to certain lawmakers. The more money one donates, the higher-level players he or she has access to. I did not enjoy making these

phone calls, and after participating once or twice, I told the party that I would no longer telephone donors.

5. Although I rarely made phone calls for the party, I agreed to attend and speak at their donor events. Often, donors would give large sums of soft money to attend events with elected officials. Donors were often allowed to choose whom they wanted to sit with at events, provided they gave enough money. Party leaders would inform Members at caucus meetings who the big donors were. If the leaders tell you that a certain person or group has donated a large sum to the party and will be at an event Saturday night, you'll be sure to attend and get to know the people behind the donation, especially if you are told that the reason people donated was because they wanted to sit at the same table with you. At these events, it was not uncommon for the donors to mention certain legislation that affected them. Even if some Members did not attend these events, they all still knew which donors gave the large donations, as the party publicizes who gives what.

6. The parties often ask Members to solicit soft money from individuals who have maxed out to the Member's campaign. Donors do not really differentiate between hard and soft [3] money; they often contribute to assist or gain favor with an individual politician. When donors give soft money to the parties, there is sometimes at least an implicit understanding that the money will be used to benefit a certain candidate. Likewise, Members know that if they assist the party with fundraising, be it hard or soft money, the party will later assist their campaign.

7. There is little practical difference between hard and soft money these days in terms of how the funds are used. Politicians care only that money is available; it doesn't matter where it came from. Although soft money cannot be given directly to federal candidates, everyone knows that it is fairly easy to push the money through our tortured system to benefit specific candidates. I always knew that both the national and state parties would find ways to assist my

candidacy with soft money, whether it be staff assistance, polling, get-out-the-vote activities, or buying television advertisements.

8. Big labor and big business use large soft money donations to corrupt the system to the detriment of the little guy. Unions and corporations were not supposed to be part of our campaign finance system, yet they are playing with size 20 feet. The hundreds of thousands of dollars in soft money donated by unions, corporations, and other groups make a mockery of attempting to avoid corruption in the campaign system. I fear that we are reverting to the past, when Daniel Webster was on the floor of the Senate, passing banking legislation at the same time he worked for the Bank of Boston. Conflicts of interest like Webster's are no longer legal, but the appearance of buying influence still exists.

9. Large donors of both hard and soft money receive special treatment. No matter how busy a politician may be during the day, he or she will always make time to see donors who gave large amounts of money. Staffers who work for Members know who the big donors are, and those people always get their phone calls returned first and are allowed to see the Member [4] when others are not. For example, one longtime contributor might come into my office and say, "Al, I'm really proud of the work you're doing here, and I'm proud to have supported you over the years. I just wanted to let you know that my company has an important issue up before Agency X. We don't want you to do anything; we just want to make you aware." A few months later, that same contributor would come back and say, "We're still waiting for the agency to make a decision. We probably don't need you, and we wouldn't want you to influence the decision, but maybe you could see if the agency would move the issue up on their priority list?" Without hesitation, I would make a call to the Secretary of the department in charge of the agency. I would not tell the Secretary how to decide the issue, nor would I make any threats; I would simply communicate that my constituent would appreciate a

prompt decision. Senators make these types of phone calls all the time.

10. Too often, Members' first thought is not what is right or what they believe, but how it will affect fundraising. Who, after all, can seriously contend that a $100,000 donation does not alter the way one thinks about—and quite possibly votes on—an issue? Donations from the tobacco industry to Republicans scuttled tobacco legislation, just as contributions from the trial lawyers to Democrats stopped tort reform. When you don't pay the piper that finances your campaigns, you will never get any more money from that piper. Since money is the mother's milk of politics, you never want to be in that situation.

11. In addition to the examples listed above, I remember specific instances when Senators' votes were affected by the fear of losing future donations. One time, Senator Bob Dole and I were seeking votes on an important national issue. More than once, we heard a Senator tell us, "I realize it's an issue of great importance, but if I vote for that I won't get any more money.[5] I want to be here for another term. You do want me back here next year, don't you?" These Senators know that it's a bad idea to poison the well that nourishes the system.

12. Soft money also affects legislative priorities. I remember one Senator from a state with a large Asian population who came to me with a proposal to ease immigration restrictions on people from Asian countries. This Senator told me that the Asians have a lot of money and that they were ready to give it to the Republicans if the party would support immigration reform.

13. Another ugly practice involving soft money is the so-called issue ads that air right before an election. These advertisements are often paid for by unknown corporations and individuals who do not have to report who they are or where they received the money to pay for the ads. Although these ads may not explicitly say "vote against Senator Jones,"

the average guy on the street isn't looking for magic words. He's looking for negatives, and that's what these ads deliver. No matter what actual words are used, the message to vote against someone is usually unmistakable. These ads are very effective in influencing the outcome of elections, and the people who admit to running these ads will later remind Members of how the ads helped get them elected. Members realize how effective these ads are, and they may well express their gratitude to the individuals and groups who run them.

14. Both during and after my service in the Senate, I have seen that citizens of both parties are as cynical about government as they have ever been because of the corrupting effects of unlimited soft money donations. Students in my courses at Harvard and Wyoming, which have not even focused on election law, have spoken up about how disturbed they are about the corrupting effects of soft money in our political system. Even during my speaking engagements, I am sometimes asked whether I was captive to tne NRA, the tobacco industry, or some other [6] special interest group that is known for donating large amounts of money. People can't believe that elected officials can function without looking at who is putting money in the kitty.

15. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

[1 (8 PCS/MC 12)]

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Senator Mitch McConnell, *et al.*,	)	
Plaintiffs,	)	Case No. 02-0582
v.	)	(CKK, KLH, RJL)
	)	*All consolidated*
Federal Election Commission, *et. al.*,	)	*cases.*
Defendants.	)	

Declaration of Curt Smith,
President of Indiana Family Institute, Inc.

I, Curt Smith, declare the following on personal knowledge:

1. I am an adult citizen of the United States of America and a resident of Indiana.

2. I am the President of Indiana Family Institute, Inc. ("IFI"), in which capacity I am familiar with the activities of IFI.

3. IFI is an Indiana Corporation exempt from federal taxation under I.R.C. § 501(c).

4. IFI is dedicated to encouraging and invigorating Indiana families by offering them time-proven solutions to problems that harm the family, the church, and society. For example, IFI provides information on home schooling techniques and curriculum as well as factual information on the effects of home schooling on the socialization of Indiana children. IFI provides information on the prevalence and purposes of partial birth abortion in Indiana, and on the battle against child pornography and for charter schools in Indiana. Because laws and [2 (8 PCS/MC 13)] regulations do, in fact, directly impact these issues, they are the subject of discussion in IFI communications.

5. Over ten thousand Indiana residents receive IFI publications and many hear IFI radio programs and commentaries throughout the State of Indiana.

6. State, local, and federal government policy, created and enforced by elected officials, largely determines how the interests at the core of IFI's purpose are treated. Therefore, keeping the voting public informed on the issues and the candidates' and officials' positions on them is an important IFI function. For example, IFI has tracked and publicized the progress of legislation affecting charter schools and partial birth abortion.

7. On a regular and recurring basis, IFI (a) lobbies candidate legislators on legislation, (b) consults with both incumbent and challenger candidates on their positions on issues, (c) engages in "electioneering communications," and (d) publishes printed materials that inform voters and potential voters of legislation, the positions and policies of legislators and other public officials, and of potential legislators and public officials. Some of these communications are (a) done without any communication with any candidate, (b) done after communication with a candidate, or (c) done with the agreement and/or formal collaboration of a candidate.

8. IFI has had and continues to have a relationship with Representative Mike Pence, based on their common views on issues such as home schooling, charter schools, partial birth abortion and the proliferation of child pornography; IFI and Rep. Pence help each other because doing so furthers their common views. U.S. Rep. Mike Pence has and will continue to raise and to assist in rasing funds for IFI, and IFI has communicated and will continue to communicate with Rep. Pence about raising and assisting to raise funds for IFI. [3 (8 PCS/MC 14)]

9. Appended as *Exhibit A* is a true and correct copy of an IFI fund-raising letter sent to potential donors to IFI noting that, in the wake of a slowed economy and the September 11 terrorist

attack, giving to nonprofits was down and that giving to IFI had declined by thirty percent. The IFI letter encouraged recipients to join IFI's Leadership Council by contributing one thousand dollars, noting that donors would have the opportunity to meet with Rep. Pence at a private briefing:

> As a member of the Leadership Council, you will receive . . . regular private briefings with national and state newsmakers and policy leaders. **The Council will host Congressman Mike Pence in the near future, we anticipate (though it is not yet confirmed) holding a special Leadership Council event with Special Prosecutor Ken Starr in 2002, and a key White House official has also agreed to schedule a briefing for IFI's Leadership Council.** I ask you to join this key group today. [emphasis in original]

10. IFI intended in this letter to make use of potential donors' esteem for featured guest Rep. Pence to solicit funds for IFI. In this and other situations, IFI and Rep. Pence have communicated, and will continue to communicate, with regard to raising and assisting in raising funds for IFI.

11. IFI also does fund-raising dinners, which charge a per-plate fund-raising charge and feature a noteworthy speaker from the pro-family movement. Additional solicitations are commonly made at such events. Rep. Pence and his wife, who have been members of our Board of Advisors, have attended such events, have asked others to attend, and IFI intends to ask Rep. Pence to be a speaker or featured guest at future such events.

12. IFI qualifies as an "MCFL-type" organization under *FEC v. Massachusetts Citizens for Life*, 479 U.S. 238 (1986) ("*MCFL*"), in that it was not established as a business corporation or a labor union; has no shareholders or other persons affiliated with it who have a claim on its assets or earnings; its organizational purposes are to engage in public welfare activities; its

major [4 (8 PCS/MC 14)] purpose is not to nominate, elect, or defeat federal or state candidates; has no capital stock; receipts from business corporations, if any, are de minimis; its business income is insubstantial; and it is not affiliated with any political candidate, political party, or campaign committee.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this date: Sept. 25, 2002

/s/ Curt Smith
Curt Smith

[caption omitted]

DECLARATION OF BONNIE SOLID

I, Bonnie Solid, hereby declare under penalty of perjury of the State of Georgia:

1. I am a citizen of the United States and a resident of the State of Georgia.

2. I am above the age of 18, and I am competent to testify to the truth of the matters asserted in this Declaration.

3. I am married to Kevin Solid, and we are the parents of Daniel.

4. Daniel is fourteen years old.

5. He was born on December 28, 1987, in Georgia.

[end of page 1]

6. As a family we have chosen to provide for Daniel's education at home, rather than by sending him out to a local public or other school.

7. As a family, we consider citizen involvement in government, legislative processes and politics to be an important duty, and we have supported and encouraged Daniel's involvement in political campaigns.

8. We have also encouraged Daniel's involvement with Teen Pact, where he has gained important knowledge and training about the political and legislative processes.

9. I am aware that legal limits on the amount of money that I can give to a candidate for federal office have been enacted by Congress.

10. I am also aware that federal law prohibits me from giving money to a candidate for federal office in the name of another, even in the name of one of my children.

11. I have never used my children's name, or any other person's, in making a political donation, in order to avoid limits that the law places on my ability to support candidates of whom I approve.

12. Daniel has money that he has earned working for

neighbors, or that he has received as a gift.

13. Daniel manages his money, and he chooses whether and how to spend it.

[end of page 2]

14. Admittedly, he seeks counsel from his dad and me on intended purchases, and on occasion we have asked him to give further thought to an intended purchase.

[subscription and signature omitted]

[caption omitted]

DECLARATION OF DANIEL SOLID

I, Daniel Solid, hereby declare under penalty of perjury of the State of Georgia:

1. I am a citizen of the United States and a resident of the State of Georgia.

2. I am a minor, 13 years of age, and was born on December 28, 1987.

3. Although I am not an adult, I understand that it is important to speak truthfully about the facts that I know, and admit honestly when I do not know something; I understand that not telling the truth in this statement would be a wrongful thing, and that I have the duty under the law to tell the truth.

4. Although I am not an adult, I understand the difference between facts and fantasy, and that my duty in making this statement is to testify to facts, and to avoid making up things that I cannot remember or do not know.

[end of page 1]

5. My parents are Kevin and Bonnie Solid.

6. I am their oldest child, and I have one brother.

7. We live in Commerce, Georgia.

8. I am home-schooled.

9. In addition to my studies at home and in Christian school about civics, government and history, I have learned about legislation and politics, by attending training programs sponsored by Teen Pact.

10. Teen Pact is an organization founded by our neighbor, Tim Echols, to teach Christian students about the work of legislators and lawmakers, and about the basic operation of the political process in our country and our states:

1. Teen Pact teaches kids about state legislation and political activities.

2. We listen to speakers, study

materials, and have activities that allow us to look close up at legislative and political activities on the state level.

3. Also, we interviewed lobbyists at the legislature, and we heard from some legislators, and had the opportunity to ask them questions.

4. Participating in the Teen Pact programs has given me an understanding of how state legislatures work, including the process in the legislature and the outside activities of lobbyists and others who influence legislation.

5. I have become interested in government, politics and legislation, and the training at Teen Pact has increased my interest in these subjects, as well as my understanding.

6. Teen Pact has also been a benefit to my spiritual life and development

[end of page 2]

because that is an important component of the program.

11. As a result of my learning about legislation, government and politics, I have been involved in helping certain candidates for election in their campaigns.

12. For example, I have worked on Mike Beatty's campaign. I worked at his headquarters making campaign signs, and doing other needed work.

13. In addition, I have distributed and put up his campaign signs.

14. I am a Christian.

15. By that, I mean that I have accepted the gift of salvation that comes through Jesus Christ and His death on the cross.

16. My family and I attend Calvary Chapel, and my brother and I teach in the Sunday School program for the smaller children, with sometimes as many as 30 students in the class.

17. As a Christian I would like to spread the faith inside the legislative process, and hope that the result of that

will be to affect our country, change its direction, and hopefully, cause it to end legalized abortion.

18. I want to be involved in helping put into office men and women who will make a difference for the better of our country.

19. I also believe, as a principal of my faith, that it is important for persons who are followers of Christ to be involved in politics and in governing our Nation.

20. As I understand the new campaign reform law, after November 5, 2002, until I reach my eighteenth birthday, I will not be allowed to give my money to candidates for elective federal office, including candidates for the Presidency, for the Senate and for the House.

[end of page 3]

21. In addition, as I understand it, after November 5, 2002, until I reach my eighteenth birthday, I will not be allowed to give money to any committees of political parties.

22. Being barred from supporting candidates who share my beliefs, opinions, and views, deprives me of the ability that I currently have to give money to such candidates, and takes away a means I have of expressing two different things: my support for the candidate, and my association with the candidate toward common goals.

23. As things stand now, I am free to donate money to a candidate for federal office or the committee of a political party; but once the new law takes effect, I will lose that right.

24. Although I am young, I do have my own money, that is under my direction and control.

25. I earn money several different ways:

1. I have done painting to earn money, and I have done it for more than one of my neighbors.

2. I have also earned money by doing yard work in the neighborhood.

26. From time to time, as I accumulate money, I deposit some money into my savings account.

27. Together with earnings that I have not yet deposited, and with funds in my savings account, I have money that I can use as I wish, and would be able to make a donation to a candidate that fits my requirements for office because of his beliefs and opinions.

28. My parents have encouraged me to save money, and they have never forced me to spend my money in one way or another. If I wanted to do so, I could spend it in many ways; but

[end of page 4]

when the new law goes into effect, one way I will not be free to spend my own money is to support federal candidates with whom I agree.

[subscription and signature omitted]

DECLARATION OF GAIL STOLTZ

1. My name is Gail Stoltz. Since May 2001, I have been employed as the Political Director of the Democratic National Committee ("DNC"). From 1998 through 2001, I worked for the Service Employees International Union as Government Affairs Director. Prior to this I worked as Political Director for the DSCC and in various capacities for the DNC. I am making this declaration in response to a subpoena duces tecum served on the DNC by Intervening Defendants in this action, and in lieu of producing certain categories of documents.

2. As Political Director of the DNC I am responsible for ensuring that effective campaigns are mounted for Democratic candidates at all levels of the Democratic ticket. My duties include ensuring that the Democratic Party effectively registers, identifies and contacts voters and that our campaigns run smoothly. To accomplish these tasks, I oversee two separate divisions within the DNC: the five "regional desks" and the "base vote" directors. The regional [*2] desks oversee DNC activity in five geographic regions. They design political plans for each region, help design coordinated campaign plans for the states in the region, and give advice and assistance to the state parties in the region. The base vote department mobilizes the Democratic base vote and is structured by voter group, for example, African Americans, Latinos, Seniors, etc.

3. One of my major functions is overseeing our "coordinated campaign" programs in the various states. A coordinated campaign is a project of the state party to register, identify and turn out voters on behalf of the entire Democratic ticket, including federal, state and local candidates. The purpose is to increase turnout of Democratic voters for the benefit of all the Party's candidates, whether for state, local and federal office. Typically, the various state parties draft a "coordinated campaign" plan, which is then approved by the

political staff at the DNC. The DNC's outside political consultants and donors to the "coordinated campaign," such as labor unions and other interest groups, also sometimes review the "coordinated campaign" plan.

4. State parties often hire campaign consultants such as direct mail and phone bank specialists to assist in the coordinated campaign. Direct mail consultants design mailings and then mail them to voters or prepare them for processing by volunteers. Phone bank consultants often organize and hire staff to run phone banks themselves, or they set up phone banks for Democratic Party volunteers. Sometimes the DNC provides recommendations to the State Parties about which vendors to use and sometimes the DNC endeavors to assist the State parties in negotiating contracts with these vendors.

5. A "coordinated campaign" is financed with a combination of funds raised by the state party itself and funds contributed to the state party by various national party committees, including the DNC, by candidate committees, and, as permitted by and pursuant to applicable [*3] state law, by individuals and entities such as labor organizations, corporations, state-registered political committees and other organizations. *See Exhibit A*. These funds are then spent for the operating expenses of the coordinated campaign (staff, rent, etc.) and for the costs of voter contact activities such as literature distributed by volunteers or paid workers, telephone banks, slate cards and mailings.

6. Federal, state and local candidates participate in the design and operation and, in some cases, the funding of the coordinated campaign. Candidates may participate because of their leadership roles in the party within the state or because they are running for office and will thus benefit from the coordinated campaign activities that assist their own campaign and the entire ticket. Sometimes these candidates contribute their own campaign funds from their authorized

committees to the coordinated campaign, but more frequently the candidates will ask donors to contribute funds directly to the coordinated campaign in both federal and non-federal funds.

7. If a participant in the coordinated campaign committee for a state, including the DNC, is responsible for a donation by a donor to the coordinated campaign, that donation is credited against the participant's funding commitment to the coordinated campaign. The DNC sometimes asks donors to give funds directly to state parties as part of an effort to fund fully as many coordinated campaigns as possible. For example, the DNC may ask a donor to contribute to one particular state's coordinated campaign. If the donor agrees, DNC staff normally contact the state party staff to tell them that a donation is coming, and that this donation should be credited towards the DNC's commitment to help fund the coordinated campaign.

8. Sometimes DNC staff find it hard to convince donors to give to coordinated campaigns since they are run by state parties. We then try to convince the donors that it is **[*4]** important to win at all levels of the ticket and remind them that their contribution will help federal as well as state candidates. The candidates who raised money from donors -- or had money raised on their behalf by the party -- to help complete their coordinated campaign commitment are aware when those donations come in or are made.

9. The DNC helps develop the coordinated campaign plan in a state and provides money, advice, and technical assistance. The DNC also helps with recruitment and training of staff and workers. The DNC decides which coordinated campaigns to invest in based on whether there are competitive federal and state elections in that state. For example, the DNC is more likely to contribute more funds to a state which has just received an added congressional seat

through redistricting or which has a competitive governor's race or an open U.S. Senate or Congressional seat.

10. The goal of the coordinated campaign is to win "from the top down," in other words, they are designed to help Democratic candidates at all levels of the ticket. Coordinated campaigns are also important for other reasons. For example, state legislature candidates often are the "farm team" for federal candidacies, especially in states with term limits. Also, the ground operations such as voter development and get out the vote activities can be important to the success of federal elections in the state. Also, races for governorships, mayoral offices, and other state and local offices are important because the candidates, and officeholders resulting from those races, can have significant effects on voter development and, thus, the success of the Democratic ticket, in the pertinent election or future elections.

11. Coordinated campaign committees generally are not involved in airing DNC issue ads, and I am not involved in the DNC's issue advertising strategy, although I am aware of ads being run, as well as other information such as poll results, as a part of weekly and even daily **[*5]** senior DNC staff meetings that involve exchanges of information about what's going on the campaign front and strategizing as to the best approach. Senior DNC officials, such as the executive director, political director, and general counsel are responsible for the DNC's issue advertising, however, the creative work is mostly done by outside consultants. We try to coordinate sufficiently with other DNC staff, campaign staff and outside consultants, to ensure that the message being sent in the media and by the coordinated campaigns do not conflict.

12. I am aware that, while state parties don't like to give their hard-earned donations to each other, they "swap" federal and non-federal dollars, the goal being to provide state

parties with the right mix of funds to maximize the usable funds that a state party may have.

13. As political director, I sometimes brief major donors at events planned for them on how various DNC campaigns are doing. I also sometimes speak at fundraising events for the DNC. Donors sometimes call me to receive "political reconnaissance."

14. The DNC's and Political Director's major focus during Presidential election years is the election of the Presidential candidate. In such years the DNC provides more resources to coordinated campaigns, in part to secure the election of the presidential candidate. The DNC hopes that the chosen presidential message is good for all Democrats on the ticket. During such years the DNC coordinates with presidential campaign committees regularly through frequent discussions and meetings between the DNC and campaign staff. DNC and presidential campaign staff are also in daily contact about which messages to focus on. This is particularly true once it is clear who the Democratic nominee will be. At that point, the DNC works in tandem with the Presidential campaign and the nominees. *See Exhibit B.* The DNC and the campaign exchange polling data, see each others' ad scripts, and in the 1996 and 2000 election cycles, used common campaign and/or media strategists and/or consultants. For example, during a particular week the **[*6]** presidential campaign may want to emphasize the candidate's views on Social Security. During a morning message call, the DNC, campaign staff and consultants may discuss this message and work to make sure the coordinated campaign emphasize this message.

15. One of the most desirable times for running TV or radio ads is in the last three weeks before an election. This is the time when most voters are paying attention and when the undecided voters are making up their minds. Advertising in August is not as effective as advertising closer to the

election in November. We advise candidates running ads to "buy back from election day," in other words prioritize buying advertising closer to election day rather than earlier in the cycle.

16. In my experience, issue ads affect elections. The ads can either demoralize or confuse voters so that they do not vote, or they can energize a voter base for or against a party or its candidates. During a presidential election year, the ads definitely make a difference when a presidential candidate is featured.

17. I declare under penalty of perjury that the foregoing is true and correct to the best of my current knowledge, information and belief.

Dated: October 2, 2002 s/
Gail Stoltz

[EXHIBITS OMITTED]

[caption omitted]

DECLARATION OF CYNTHIA WHITE

I, Cynthia White, hereby declare under penalty of perjury of the State of Georgia:

1. I am a citizen of the United States and a resident of the State of Georgia.

2. I am above the age of 18, and I am competent to testify to the truth of the matters asserted in this Declaration.

3. I am married to John White, and we are the parents of Zachary.

4. Zachary is twelve years old.

5. He was born on July 7, 1989, in Georgia.

6. As a family we have chosen to provide for Zachary's education at home, rather than by sending him out to a local public or other school.

[end of page 1]

7. As a family, we consider citizen involvement in government, legislative processes and politics to be an important duty.

8. I work with the local Republican party, and Zachary often helps me with our activities.

9. Zachary and I have attended and worked at party conventions together; in addition, we have walked precincts together to support candidates.

10. Zachary is keenly interested in history and in politics, even at his young age, and has willingly participated as a volunteer and supporter in the campaign activities I mentioned above.

11. I am aware that legal limits on the amount of money that I can give to a candidate for federal office have been enacted by Congress.

12. I am also aware that federal law prohibits me from giving money to a candidate for federal office in the name of another, even in the name of one of my children.

13. I have never used my Zachary's name, or any other person's, in making a political donation, in order to avoid limits that the law places on my ability to support candidates of whom I approve.

14. Zachary has money that he has earned by doing chores, or that he has received as a gift.

15. Zachary controls his money, and he chooses whether and how to spend it.

16. Admittedly, he consults with his dad and me, and on occasion we have asked him to give further thought to an intended purchase.

[end of page 2]

[subscription and signature omitted]

[caption omitted]

DECLARATION OF ZACHARY WHITE

I, Zachary White, hereby declare under penalty of perjury of the State of Georgia:

1. I am a citizen of the United States and a resident of the State of Georgia.

2. I am twelve years old, and was born on July 7, 1989.

3. Although I am not an adult, I understand that it is important to speak truthfully about the facts that I know, and admit honestly when I do not know something; I understand that not telling the truth in this statement would be a wrongful thing, and that I have the duty under the law to tell the truth.

4. Although I am not an adult, I understand the difference between facts and fantasy, and that my duty in making this statement is to testify to facts, and to avoid making up things that I cannot remember or do not know.

[end of page 1]

5. I am a Christian.

6. I am a home-schooled child, and I always have been. This coming year I going into seventh grade.

7. Being home-schooled has also helped me to learn responsibility for myself and my schedule.

8. My favorite subject of study and interest is history.

9. I love reading about history, and can usually be counted on to bring a history book to the breakfast table in the morning.

10. I realize that not everyone shares my views and opinions, and that some people may disagree with them strongly, but I have concluded that our country is in grave danger from the collapse of its morals:

a. I am referring to legalized abortion, by

which children who are not yet born are legally killed; in the twenty-nine years that abortion has been legalized, something like thirty million babies have been slaughtered, and sometimes those abortions are paid for by the government.

b. I am also referring to the legalization of sodomy and other homosexual conduct.

c. I am also referring to the damage that divorce is causing in our country with so many children being raised in homes without both a mom and a dad.

d. In addition, I believe that our national weakness is to be blamed on the lack of a real standard of value for our money.

[end of page 2]

e. Many of these same factors coincided with the fall of the Roman Empire and with the collapse of other nations.

11. My interest in, and study of history, has also made me interested in and committed to being involved in political activities, including studying candidates for office, and providing support to candidates for office whose views and opinions on important matters I share.

12. Based on my study of history, I am searching for candidates to support who will serve as statesmen, and not just as politicians; in other words, the kinds of people who cannot be bought; people who are like James Madison, Benjamin Franklin, Theodore Roosevelt, and Ronald Reagan.

13. As a family, we have also been involved in politics.

a. My mom and I have attended party conventions of the Georgia Republican Party.

b. At these conventions, I have distributed leaflets, magnets, and other materials advertising my preferred candidate; no one told me to do this, I simply took quantities of the available materials and worked the

crowd distributing the materials.

c. I also have attended campaign rallies.

d. With my dad, I have helped to distribute and set up yard signs for candidates.

e. And I have walked precincts with my family and distributed materials about the candidates to encourage people to vote.

[end of page 3]

f. In fact, I also have engaged in discussions with people that I met while distributing campaign materials door to door, and have some people tell me that they would vote for the first time, or for the party I represented for the first time, because of my presentation to them.

g. In fact, I have also contributed money to a candidate for office, in the amount of Five Dollars.

h. That contribution I made with my money that was under my own direction and control.

14. The candidates that I have supported by volunteering, by the recent campaign donation, and by other activities, are ones that I have chosen after careful thought and research.

15. Because of my Christian faith, I will only support a candidate that is pro-life.

16. Also, I think that our government has gotten too big, and that too many people have gotten used to relying on it, so I can only support candidates that agree with me about reducing the size of government.

17. And, I think of myself as a Republican because that is the political party that has taken a stand against abortion and for the rights of children before birth.

18. When I am thinking about a candidate to support, I research to learn their views on the matters about which I care.

19. My parents and I have not agreed on every candidate and every election that we have worked on. In one

recent election, I could not support the candidate my dad did, and my dad knew that I was helping the opponent but did not try to stop me from doing so.

[end of page 4]

20. When the campaign reform law takes effect, I will be forbidden to support with a donation a candidate that I have chosen to support who is seeking federal elective office.

21. Also, when the law takes effect, I will not be allowed to give the money I have earned to committees of the political parties I support or associate with.

22. Because of my interest in government, legislation, and politics, and because of my Christian faith, I plan and intend to continue seeking out candidates for federal elective office who represent my views and beliefs on important questions like the right to life of children before birth, and on the size of our government.

23. When I find such candidates, I plan and intend to make donations to them, just as I did.

24. Working for the election of a candidate and giving financial support to the election of a candidate are two ways that I am able to demonstrate my association with those candidates who share my beliefs and opinions.

25. While working on campaigns is an important activity, I also think that it is appropriate to give financial support to candidates.

26. The new restrictions on my rights really do affect my rights and limit my ability to show that I share in the views and opinions of the candidates I choose.

27. I have money that is my own and that I have control over; that money includes funds I have earned for doing chores, and money that was given to me as a gift, but not as a gift with the purpose of actually donating it to a political candidate.

[end of page 5]
[subscription and signature omitted]

Deposition of Wright H. Andrews
(October 22, 2002)

* * *

[16] THE WITNESS: Let me say that I think that the general public does not have a technical understanding of hard money versus soft money. And I'm talking if you went out to Joe Six Pack or almost the vast majority of Americans, it would be my personal bet, but I may be wrong.
BY MR. HUME:
Q. One last question on paragraph 20 which [17] is essentially what I was trying ask when I began, which is, is it therefore the case that in your view there is a disconnect between the reality of what goes on in Washington between lobbyists and politicians and the perception that the public has?
MS. GACKI: Objection, vague.
MR. HUME: You can still answer.
THE WITNESS: I would say there is not full understanding in many cases.
BY MR. HUME:
Q. I'd like to refer you to paragraph 6 in your declaration again. I'll just read it into the record for the sake of the record. Paragraph 6 reads, it's overly simplistic and inaccurate to say that legislative outcomes are generally "purchased" unquote by campaign contributions or expenditures. But there can be no doubt that political contributions serve at least two important political goals, securing access and building relationships. Is it your view that the effect, I'd like to stay on the public's perception for a moment, that the public's perception of the quote unquote [18] "corruption" or the misperception about how Washington works is a perception that powerful special interests use money to obtain disproportionate access to politicians?

MS. GACKI: Objection. Beyond the scope of the direct testimony and mischaracterizing the witnesses testimony.
BY MR. HUME:

Q. I apologize if I'm mischaracterizing, but that's partly why I am asking the question is to give you a chance to characterize it. I am trying to understand what I take. I understood paragraph 6 to be a very central part of what this declaration is saying, which is that there may not be quid pro quo corruption but there is long term relationship building and access, so I'm asking now trying to connect and ask you to connect to the extent you can, what you saying about the public's perception, and what you are also saying about this long term relationship building, so it is not beyond the scope of what you are saying. I am trying to understand what you are saying. [19]

MS. GACKI: Objection, compound. And could you restate the question?
BY MR. HUME:

Q. I'm happy to restate the question. I'm happy to restate the question. Is it your opinion, Mr. Andrews, that the public has a misperception that special, powerful special interest groups use money to gain disproportionate access to office holders and politicians?

A. Yes.

Q. And?

A. Many in the public, not everyone one but a broad section.

Q. Would you also agree that some organizations and some individuals gain access not because of money but for other reasons?

A. Absolutely.

Q. That, for example, celebrity individuals are going to have disproportionate access, would you agree with that?

A. They could.

Q. They may? [20]

A. They may.

Q. Some take advantage of it, some don't?

A. Celebrity individuals certainly do play some part sometimes on some issues. They tend to on most issues I think, in many cases I think they may seek not to advance, if you will, corporate interests but more broad social causes but sometimes they do come in, right.

Q. I'd like to move to another category, what I am going refer to as voluntary membership organizations, nonprofit groups that represent large constituencies of individuals?

A. The Sierra Club, for example.

Q. The Sierra Club, the AARP, that represents the interests of retired persons which I think is refuted to be one of the more powerful.

A. The National Rifle Association.

Q. The National Rifle Association, to use another example. All of those groups represent individuals mostly, and have for many years have been considered to be very influential in Washington, rightly or wrongly. My question with [21] respect to those groups is do you think that they have, that their access and their influence comes in part from the fact that they represent a huge number of constituents, individual constituents?

MS. GACKI: Objection. Lack of foundation.
THE WITNESS: I think that obviously there are many ways to influence the legislative process. One way in which the legislative process is influenced is by having a significant grass roots organization, for example, or a grass roots capability, that clearly improperly utilized will give influence in the legislative process. I find nothing wrong with that as a general proposition.
BY MR. HUME:

Q. I'd like to refer to paragraph 3 then. We continue to move backwards through your declaration. In paragraph 3 you give an account of some of the activities you've been involved in as a lobbyist and you list three specific ones. I'd

like to refer to a third where you say that you've been involved in quote, and I'm quoting from your [22] declaration, counseling clients on how to use their money in quote "issues ads " legally to influence the legislative and political process. First some background, Butera and Andrews is the name of your firm, is that right?

A. Yes. Butera and Andrews is the name of my current law firm, yes.

Q. And it's a law firm but it's principly a lobbying firm?

A. A law firm that does a significant lobbying and litigation in two areas, principal areas of the firm.

Q. And how long has that, how long have you had that firm in operation?

A. I believe we began, I think it was January 1, 1990.

Q. And prior to that you were at the law firm of Sutherland Asbill and Brennan?

A. Sutherland Asbill and Brennan starting in 1975.

Q. You've never worked as a media consultant, have you? [23]

A. No.

Q. Your work as a lobbyist, I take it, has principally been, has principally involved the interests of your clients in pending federal legislation?

A. Principally, yes. Overall, I'm also involved in state legislation.

Q. How much of your work over the years has involved advising your clients on how to influence elections?

A. That would be a relatively small part. I don't know. That is just one thing that comes up during the lobbying discussion in, you say to influence elections, again, let me elaborate. That in dealing with clients, clients will ask, as I'm sure you understand, for recommendations concerning making PAC contributions, for how they might make other expenditures or take other positions within the bounds of law and where the law might be. Sometimes in the

past I used to give considerable amounts of election law advice. I've now moved away from that and tend to let clients have somebody else [24] who spends full time on that these days, give them specific advice but I will approach things from a lobbyist perspective, oftentime, and as a general counselor who has been in the trade for many years, and who does work from time to time with media consultants, I'm part of an overall team.

Q. So you have given advice to your clients on a professional basis in terms of how they should contribute their money to?

A. I have in the past, yes.

Q. On a professional basis?

A. Yes.

Q. And what is the expertise that they are paying you for in that case? In other words when it's not analysis of federal election law?

A. Well, when one says on a professional basis, I think in Washington we often have to have or we often have a combination in which clients look to you for both a legal advice or a general legal advice but also they look to Washington counsel for political advice on what is perceived to be the best and most effective way that they can further [25] specific or general legislative interest.

Q. Specifically with this third area that you reference in paragraph 3 where you say counseling clients in how to use their money and issue ads legally to influence the legislative and political process; how frequently during your career has that particular activity come up?

A. I have never kept count. Some, I do not know the specific amount of time but it comes up from time to time.

Q. Would you say it comes up less often in your career than does general advice for where to contribute?

A. Yes.

Q. And are you including within subparagraph 3 here, when you say how to use their money and issue ads, are

you including there how to use their money generally through hiring additional law firms, lobbyists, making additional soft money contributions? I mean is this essentially a catch-all?
MS. GACKI: Objection. Compound. [26]
THE WITNESS: I think this three is referencing using political contributions primarily or political expenditures, it could certainly since I have spent and do spend time advising them other ways of using their money, and again campaign contributions are simply one means of influencing the process, but it does include the use of money, be it PAC contributions or soft money, or expending money for advertising.
BY MR. HUME:

Q. How many specific examples can you recall today where you advised clients to undertake an issue advertising campaign?

A. I honestly do not know, you know, specific a specific number. I can simply say that I have done so on more than one occasion.

Q. Can you tell me any specific examples?

A. And I will not disclose, you know, any specific clients that I have done so. I will say that you know, I have done so, and in fact, have done so recently, currently.

Q. And presumably the issue advertisements [27] that were run, were aired publicly?

A. With respect to the issue, there has been some issue ads that have been run.

Q. Can you tell me specifically which issue ads were run by clients that you advised to run those ads?

A. No.

Q. And on what grounds will you not tell me that?

A. Because you know I am not going into individual client activities.

Q. Are you claiming privilege?

A. I'm claiming privilege and I won't answer that.

BY MR. HELLMICK

Q. Can you elaborate on that, please, considering the protective order that is in place and that all of this testimony is sealed, that it's highly confidential and counsel and you volunteered. I don't mean to interrupt, Mr. Hume, but I'm just looking for clarification.
MR. KESSELMAN: I don't think the witness [28] needs to explain the privilege. You can certainly argue as anything to the weight of his testimony that you want, if he's not providing you with specific examples and you're unhappy with that, but if the witness is telling you that he thinks that it's privileged and he's giving you answers about things that he knows about, that's, I mean that's, I can just tell you I think those are the answers that you are going to get from the witness.
MR. HELLMICK: Ordinarily I would agree with you, however, in this instance the witness is using this as a sword and a shield. He's saying I know of instances where I have done this and it's impacting my testimony, but I won't tell that you what that is. And so that's completely unfair to us. How do we conduct legitimate discovery on the heart of his deposition which are, I shouldn't say heart, but one of them, which is issues ads. And he's saying I am doing it right now, but I'm not going to tell you who. That is something that is directly impacted by the BCRA as we all know and you.
[29] MS. GACKI: I don't know that you need names of clients and specific strategies that he's given.
MR. HELLMICK: It's all protected and that's why we have the protective order. He volunteered to be a witness.
MS. GACKI: And you need names in order to conduct, to effectively test this?
MR. HELLMICK: To explore whether or not it's an electioneering message, yes; to explore what the impact is or what the intent of the message; yes, and I would ask that the Department of Justice to take a position, because you're not representing this witness, take a position as to whether or not

you will at least encourage him on the record to answer this because he's your witness.

MS. GACKI: We will not encourage him to answer.

MR. KELLEHER: We have encouraged the witness to answer truthfully, fully, honestly any question that is put before him. We cannot force this witness to testify about specifics, if he [30] believes that those are privileged, or if he's simply not willing to reveal them. Certainly you can make any arguments to the Court that you want about the weight of his testimony and we have encouraged him to give as full a testimony as he's willing to do, and you know, you can certainly ask questions and see what answers the witness gives, but the Department of Justice is encouraging the witness to testify honestly and truthfully and on the basis of personal experience and that's. Sorry about that, Hume.

BY MR. HUME:

Q. Mr. Andrews, can you tell me whether or not the Department of Justice advised you that you did not need to disclose specific instances of advice you've given to clients that you referred to in paragraph 3?

A. Not specifically that I recall.

Q. Did you ever ask them whether or not you could keep that confidential?

A. I may have had somewhere in the discussion with them a mention at least on my part, [31] that I would not feel it appropriate to go in detail into client matters. I think I may have said that at some point.

Q. Did they ever ask you, did they ever include other paragraphs that would have included more detail about specific instances that you were giving advice?

A. There I am very consciously in preparing this did not include specific client related matters where any client could be identified.

Q. But they prepared it originally, didn't they?

A. They prepared simply from my oral comments and I did significant redrafting and editing.

Q. But in your original oral comments, did you give them specific examples?

A. Not that I recall because I quite frankly, would not even want the Justice Department indicating how Wright Andrews might be doing certain strategies or advice to clients, not that I don't trust them. [32]

Q. So you didn't give the Department of Justice any specific example of a client whom you advised to undertake an issue ad?

A. Not that I recall, absolutely not.

Q. And today you, unless compelled by Court, you are not willing to tell me any specific example of a client that you advised for an issue ad?

A. I am not.

Q. And you say you recall that you have done that and now I'm focusing only on an advice to a client to run an issue ad, and I would like first to ask you to define what you understand an issue ad to be?

A. As I would term an issue ad, I am referencing an ad which relates to a specific issue, in which a client might have an interest. They might be for the issue, or against the issue. The ad could be run, for example, in a series of targeted Congressional districts, urging that Congressman XYZ be contacted with reference to the issue and urged to, for example, support the measure, oppose a measure, or some other action like [33] not continuing to support the measure. That ad would technically try to be designed so that it would not be a campaign as such, campaign expenditure, something to influence the election, but the effect, of course, of such an ad, depending on when it is run, how it is stated, and can have a political outcome. When I have advised clients with respect to the political running of such ads, the objective in my cases has been to influence the number usually, as opposed to influence directly his or her election.

MR. HELLMICK: I object to the entire answer as being in contempt of the subpoena. Well, I'm not sure that there is a

subpoena, so maybe I ought to rephrase that. I object on the ground that the witness is refusing to provide specific examples of current ads that he's running, although he is specifically referencing ads, and is refusing to provide details of the types of ads and what the messages are. The witness stated that he designs them [34] so that they are not electioneering or intended but then he says they are intended to influence the election. That type of testimony goes directly to the heart of this act, and I think that the witnesses refusal to discuss current ongoing ads and ads where he is specifically referenced or that he has specifically advised clients to run such ads is discoverable and within the bounds. That's my objection.

THE WITNESS: I would make a correction. I do not believe that I said that they were designed to influence the election, I did not intend to say that. I said they were designed to influence a legislative outcome and the member, I recognize as does anyone that an ad, that an ad being run can have a political consequence and in fact influence an election.

MR. HELLMICK: Pardon me, and I did misspeak and I apologize. I intended to say that.

BY MR. HUME:

Q. And with respect to, but just to clarify, the ads that you advised your clients were intended [35] to influence a legislative outcome and the members voting?

A. Fully a legislative outcome of legislative factions, fully recognizing that such ads when viewed from a members perspective and when viewed from people within the members district, for example, that that has political implications that can flow over into the election.

BY MR. HUME:

Q. Fully recognizing that, but not having that being the reason for running the ad?

A. Not the prime purpose.

Q. Do you recall whether any of the issue ads you've advised your clients to run have been aired within 60 days of

a general election or 30 days of a primary election for the member that they were referencing?

A. In recent times I do not. To the best of my recollection they have not.

* * *

[49] Q. Do you have any specific, are you aware of any specific instances where a federal elected official has changed his or her position on an issue in, as a result of an awareness that doing so would increase financial support, and in future elections from a particular group or a particular donor?

A. I am not aware of any member publicly acknowledging that they are unduly influenced by a significant amount of contributions. I think that I can't say I am aware, that having been involved in the process for many years, that a contributions will give one at a minimum, oftentimes better access, better access leads for a better opportunity to make ones case, and I think there is a level of human nature that one would try often to help their supporters, people who have helped them; that money does not necessarily always produce the desired [50] level of influence of many contributors. There are many factors that go into an officeholder's mind in making decisions but without a doubt in my mind, money does play a significant level of influence in the legislative process.

MR. HELLMICK: Objection. Move to strike all testimony after the words, I am aware, as nonresponsive. The question called for specific factual instances of a changed vote as a result of contributions. Thank you.

* * *

[59] Q. You state in paragraph 14 that, I won't read the precise account, but you were explaining [60] how a large

soft money donation of $100,000 can get the corporate donor, you say more benefit than several smaller hard dollar contributions by that corporation's PAC, is the reason for that simply because it's more money?

A. Generally yes. I mean within that regard, if a client's PAC is, you know, has been limited to 5,000 per election. When I started out in this town, a little of the history from the earlier days, when I was both raising money, lobbying and giving election law advice to certain members of Congress, I remember very well, how I and one member were very taken by the donor who gave in the house race for the member gave him a thousand dollars. A thousand dollars seemed very big in those days. It was $250 for a house member. $500 was sort of a thing. Today one does not even get a thank you most of the time for a thousand dollars contribution. When a $5,000 contribution is made, that is appreciated, but indeed, generally expected, and certainly not enough, in many instances a larger donation can have [61] much more impact in depending on how it is used and it can be appreciated deeply, in my judgment.

Q. And in your judgment if the amounts were equal would not a candidate prefer to have the money himself or herself to spend and control?

A. Depending on the circumstance, if the amounts were equal, you would generally go for direct hard dollars. Sometimes a member may much prefer that in they have some commitment to help raise money for a party committee, as part of meeting their obligations. They certainly would appreciate and respect a client donating money to that or even I suppose to a leadership fund with an appropriate account.

MR. HELLMICK: Objection. Move to strike as speculation.

BY MR. HUME:

Q. Is it your view that generally, well, let me try to rephrase that also. Do you have any specific knowledge of an instance where a client of yours has chosen to run an issue ad instead of making a soft money donation? [62]

A. In terms of making a conscious choice between the two, not that I recall you know, in that basis.

Q. Is it fair to say that, do you have any reason to disagree with the following proposition that most issue ads run in close proximity to a federal election are run by independent ideological organizations that wish to advocate on behalf of their particular ideological agenda?

MS. GACKI: Objection. Insufficient foundation. Calls for speculation.

BY MR. HUME:

Q. If you don't feel that you have specific.

A. Yes. I don't have the specific data to really answer that.

Q. Is it therefore also difficult for you to tell me whether or not you think the people who are running most of the issue ads in this country would be just as happy to give the money for those issue ads as soft money?

MS. GACKI: Again, objection.

BY MR. HUME: [63]

Q. I take it that you don't have any foundation for answering that question either?

A. Give me the question again and let me give you an answer response on that one to clarify.

Q. The one that you said you didn't have a foundation for?

A. No, this is a different.

Q. Well, I had asked you whether you had an opinion, whether you had any reason to disagree with the proposition that most issue ads run in proximity to a federal election are run by ideological groups seeking to advance their ideological agendas?

A. I do not know specifically all of the issue ads run in the country, who is running them and so forth, therefore it is difficult for me to give you an informed opinion, be it speculation or otherwise, so I don't have enough to be able to agree with it.

Q. Okay. How much do you know about the awareness that federal candidates for federal office know about issue ads run in their elections?

A. My belief is having heard members over [64] the years complain that they are running ads in my district, that members pay considerable attention to the ads, sometimes they are positive, sometimes they are negative. From a political perspective I think going back to your question a moment ago as to X dollars for soft money, versus X dollars for issue ad, if I am attempting to truly influence a members, be it vote on the issue or sponsoring a bill, or if I am secretly in my heart of hearts, and I'm speaking, I not just but trying to influence an election, one would think that you could get more bang for your bucks most of the time doing an issue ad if I had, you know, unlimited sums of money or large sums of money, depending on what my goal would be, I could certainly see using the money from the advertising perspective, not that an ad will always be published.

Q. Do you have specific instances in which you recall elected officials saying that they recognize the importance of an issue ad campaign in their race in their election?

A. I just recall again over time members [65] complaining, member staff complaining that groups are running ads attacking them and in their district. That's just sort of a general thing that you get. Again, I think that occurs on a bipartisan basis. Nobody likes to have anyone doing an attack ad in particular, at least there's a high level of paranoia on that because it might cost them votes.

Q. And do you have any specific anecdotes with respect to complaints about those kinds of attack ads?

A. Not with respect to specific members, no.

Q. And is it mostly the case that complaints that the, that members, that your recollection is that members refer to ads that attack them and not to ads that have helped them?

A. The attack has always been the principal thing. I've never heard a great deal about great Americans running

ads in their favor, not that they wouldn't appreciate that but people seem to carp more.

Q. Do you have any specific recollection of a conversation with a member who expressed gratitude [66] towards a group for running negative ads against his opponent or positive ads with respect to himself, him or herself?

A. No specific recollection. I would suggest you talk to members and former members and they will give you their direct views.

MR. HUME: What I'd like to do, if I could, is take a very short break. I'm pretty close to being finished, and then I can turn over the podium as it were. We'll take a short break.

(Recess.)

BY MR. HUME:

Q. Mr. Andrews, we'll go back on the record. I'd like to ask you a few more questions about issue ads. You described earlier in your deposition your experience with your clients and you would run issue ads. More generally, I'd like to ask you based upon your experience as a lobbyist, is it your experience that issue ads, as you understand that term, can sometimes be used to bring back attention to a public policy issue that the politicians are for whatever reason not devoting much time to talk [67] about?

A. Of course.

Q. Do you think that that is also possibly a use of issue ads in the context of an election when the candidates may be elected officials or candidates as well as elected officials would prefer not to have that campaign focus on a particular hot button issue but a campaign of issue ads may have the effect of forcing them to talk about it?

A. That is one possibility, absolutely.

Q. Do you also think that ads, the issue ads may serve to inform voters about the particular office holders or candidates voting record on a particular issue?

A. I think again, depending on the timing, I think you could run into issues of election airing. Depends on what's said in the ad. A quote, "issue ad " at least as I would talk in the generic sense certainly could reference a members support for or opposition to gun control, for example.

Q. And it gives voice to the constituents or supporters of that particular issue groups [68] supporters of what they think about that candidate's position on that issue, is that right?

A. Yes.

Q. In light of the fact that issue ads do these, well, one last question. Do you also agree that issue ads as your clients issue ads did, may be designed to impact the legislative process primarily, rather than the electioneering process?

A. It is certainly possible for them to be designed that way.

Q. Okay. In many respects then, would you agree that issue ads have many of the same characteristics and fulfill many of the same roles in the public political debates as is fulfilled by lobbyists in that they give voice to the constituents' view on a particular interest, it foments and generates public debate on that interest when there may otherwise be only limited or zero debate about that interest, and so that the two play a part in our Democratic system that are quite similar?

A. I would say that an issue ad, can be [69] multifaceted. It can do some of the informing of the public, for example, or the influencing in the legislative context. It can also be very clearly disguised as a mechanism that is in essence a political, intended for political purposes. I think we all know that, and you have to separate the good from the bad and I leave that to you.

* * *

[(Sen. Russell Feingold Dep. 41)] head.

Q. Is this ad pro-Gore or anti-Gore?

A. I don't know.

Q. But you do know that it's phony?

A. I know my belief is the purpose of this ad is to influence an election.

Q. But as a sitting United States Senator that's run for office and been elected twice as Senator, you cannot as you sit here today tell us whether this ad is pro-Gore or anti-Gore?

A. Let me review it again. Well, my understanding of the way these ads usually work is when you call the guy's office, you are usually attacking the guy. This certainly is not helpful to Al Gore because what it suggests is that he was somehow responsible for the Medicare cuts and it, in my view, it's sort of a sneaky way of trying to blame him without directly saying that he should be thrown out of office or not elected. So it looks to me like an ad that attempts to cause Mr. Gore to lose votes. But I'm not absolutely certain. It sure reads that way to me.

Q. But you are certain, aren't you, that this would be covered by the law?

A. I believe it would be. I don't think I

DEPOSITION OF SENATOR RUSSELL FEINGOLD

Q. But even if, even if the donations to the state party couldn't directly benefit the Federal officeholder?

A. You mean under the new law or under the old law?

Q. Under the old law.

A. I think under the old law it could benefit the Federal officeholder.

Q. Are you aware of any examples where people have sought to receive preferential access or undue influence because of the benefit provided by soft money donations to state parties for Federal candidates?

A. I don't think so.

MR. CARVIN: I notice it's 12:35. Do you know any more about the vote situation at this point?

(Discussion off the record.)

MR. HARTH: Let's take five minutes now.

(Recess.)

BY MR. CARVIN:

Q. Just to wrap up the question and I don't think I have asked you these particular questions. Are you aware of any instances where Federal **[*133]** legislators gave preferential access or influence to soft money donors to the state or local parties?

A. In particular that the soft money contribution to the party was the reason they gave access?

Q. Reason or factor.

A. I don't know of any.

Q. Are you aware of any tallying or keeping track by the national committees of candidates who were responsible for soft money fund-raising to states?

A. I don't know how they do that or if they do it.

Q. You discussed this with Mr. Abrams, but just to make sure I'm clear, are you aware of any Representative who has ever changed their vote because of a soft money donor?

A. I cannot say to a moral certainty that that's occurred.

Q. Do --

A. It's in that person's mind.

* * *

[*189] BY MR. CARVIN:

Q. And if there was, can you think of any reason why it would make sense to allow Federal candidates or officeholders to solicit money for 501(c) organizations in the manner described, but prohibit officials or agents in the national party from doing the same activity?

A. Not off the top of my head. No.

Q. Is it your understanding that state parties are prohibited from raising soft money?

A. I don't believe they are prohibited if under their state law they are allowed to have soft money. I think they can raise soft money for their state elections.

Q. The prohibition, as it is now on state parties relates to the expenditure of what they call soft money, money not controlled by the Act?

A. Raising or spending, is that what you are asking?

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

[Caption Omitted In Printing]

Washington, D.C.

Monday, September 9, 2002

Deposition of SENATOR RUSSELL FEINGOLD

* * *

[243] source of funds. I don't know what time period this covers. 2000, that during that time period I received 55.5 percent of all my, of all of my contributions from small individual contributions of less than $200. That's how I interpret this.

Q. How typical is that for a United States Senator? To have that kind of breakdown?

A. I'm not certain. My guess is it's pretty high percentage. I don't know for sure. I know there are some that rely on a much greater extent on PACs. Certainly candidate self-financing. Probably there are a much higher percentage of those that have individual contributions. I can't authoritatively speak to the fact that this is atypical. I don't have the statistics in front of me.

Q. Based on your experience and background and based on those numbers, have you found that the prior thousand dollars contribution limits were sufficient and adequate for you to run an effective campaign, get your message out?

A. I have never considered the prior thousand dollars limitation to be a barrier to my ability to run for office.

Q. And can you comment in general about the importance of hard money contributions to political

* * *

[260] political office without access to wealthy friends, without access to wealthy interests running up against someone, an incumbent perhaps, or even a challenger with access to that kind of network, do you think the increased hard money contribution limits help or hurt that low-income candidate?

A. It would probably help the low-income candidate some but it would help the incumbent more.

Q. How does it help?

A. They would be able to identify a few people who are say close friends, a couple of people they know and get more money. On the other hand, the incumbent would probably be able to identify a lot more of those people, so there is always this question raised of, the way I have always looked at campaigns is not who has the most money, it's whether you have enough money to get your message out so it's always this question and there is the thing, the point of diminishing returns so the incumbent raises such an outrageous amount of money and runs a big money campaign against somebody who had raised enough.

I mean that person can sort of, as long as they can get their message out, they may win even though they have less money. The problem is a lot of

* * *

[264] BY MR. BONIFAZ:

Q. Yes?

A. It could go either way. We have multimillionaire senators and multimillionaire challengers. It depends on the race.

Q. Are you aware of the concept of war chests, campaign war chests?

A. As I understand the term, it's an attempt to build up a large amount of campaign contributions and the way it's been expressed sometimes is sometimes in politics, I have heard it is an attempt to discourage people from running against you. That's one connotation of the phrase war chest.

Q. Do you believe that the increased contribution limits will enable those who engage in building up campaign war chests and trying to discourage anyone from competing against them, do you think the increased contribution limits will advance that effort?

A. Far less so than the soft money system, but it is certainly more likely to advance that cause than not. Or that attempt to create a war chest than not.

Q. And what impact do you believe that will have on competition in Federal elections?

[265] A. If it has that impact, it could potentially discourage some people from running against a candidate.

Q. Do you believe that it protects and enhances the integrity of the campaign process to increase contribution limits?

A. I don't think it advances it. No. I don't think it necessarily does enormous damage at the level we are talking about here, but I certainly don't think it advances the process.

Q. Does it do any damage to the integrity of the electoral process?

A. I think every increase involves a greater possibility of damage. I am not able completely to counter the argument that's been made by Senator McConnell in the past which is what a thousand dollars was worth in 1973 versus what a thousand dollars is worth now. It's different. So I have never been entirely able to argue that the $2,000 now is really greater than the thousand was before.

Q. But your campaign experience shows that you have been able to run under the thousand dollars limit?

A. Sure. I'm just saying in terms of the net effect of the process, I'm not sure you could

* * *

[(Kenneth Goldstein (Vol II) Dep. 182)] talk about in the rebuttal report is that it goes both ways. So in seventy-five percent of the cases when it was originally electioneering — excuse me, on ads that were originally coded as electioneering, twenty-five percent of the time they thought it was genuine issue, but also on those ads that they thought were genuine issue, twenty-five percent of the time they thought they were genuine — they thought they were electioneering. So the net affect would be that it cancels itself out.

Q. Well it doesn't cancel itself out if what your focus on is determining how much speech that is genuine issue speech is affected by BCRA. We don't particularly care about the other half of the occasion, Professor Goldstein. All I'm interested in is that it's clear that twenty-five percent of the time reasonable people would disagree —

A. But you would, because it would be adding ones that aren't here to that, correct?

Q. No. You are just saying they're wrong twenty-five — they disagree twenty-five percent of the time if it's an issue ad and they disagree twenty-five percent of the time if it's an electioneering ad. That's all I'm saying.

A. Okay.

Q. I think we have previously marked and we will find it,

THE WITNESS: That sounds correct.

BY MR. BURCHFIELD:

Q. And you would anticipate, wouldn't you as a knowledgeable observer that with the electioneering communication restrictions precluding such groups from engaging in broadcast issue advocacy within 60 days of a general election that such activities as phone banking, direct mail and door-to-door canvasing will increase among those groups, right?

MR. PHILLIPS: Objection, calls for a legal conclusion, misstates the law. You can answer the question.

THE WITNESS: I would agree with the thrust of what you're proposing, which is that as money that otherwise would go to mass media communication is channeled in other ways it will doubtless find more expression in get-out-the-vote activities.

BY MR. BURCHFIELD:

Q. Dr. Green, you are by training a broadly educated individual, but part of your training I take it is in statistics?

A. Correct.

* * *

[*58] Q. 1990. Now, what literature were you aware of since 1990 that you consider statistically reliable on the point

of whether PAC contributions or any political contributions affect roll call voting?

A. This paragraph doesn't say anything about roll call voting, this paragraph says -- it offers little support for the popular view this PAC money permits interests to buy or rent votes on matters that affect them. Those may or may not be roll call votes.

Q. Okay, let's stick to roll call votes. What statistical work are you aware of that you think is statistically valid since 1990 that correlates contributions to candidates to roll call votes?

A. None.

Q. Now, this -- I take it the qualification you have posed on my earlier question is what this article does, which is to correlate contributions or attempt to correlate contributions to what they refer to as legislative effort?

[*59] A. That's not the only difference. There is a difference between votes and roll call votes. For example, there could be committee votes, there could be informal votes in markup.

Q. Okay. Other than this study, what statistically significant analyses have you seen that correlate contributions to candidates to non roll call voting activity?

A. I would say that there are 3 and they are cited in my report. The first would be the analysis by Professors Romer and Professor Snyder, which examine how changes in PAC contributions followed changes in committee assignments. It did not look specifically at voting as an outcome, but I think in a very clever research design inferred the purchase of either votes or effort or something else of value such as perhaps administrative oversight from the way

in which the money followed the institutional positions of the members involved controlling for that putative ideological position, since they were the same members who were switching committee.

Q. What page are you referring to of your report?

A. That's page 25. And I also refer on page 24 to a study by Cox and Magar, which gets at the **[*60]** same issue with respect to the change in the majority status of the two parties arguing that one way to infer the value of public office holding in the eyes of those who seek to buy access, effort, votes, oversight is to examine the way in way the pattern of contributions changes after party control changes, so these are two analyses by either economists or economically minded political scientists who are looking at what might be termed the compare statics of campaign contributions.

Q. But, Dr. Green, isn't that different, aren't those two studies measuring the effect of changes in the position of the office holder on contributors, not the effect of contributions on office holder behavior?

A. Well, they are trying to make the argument that those patterns would change -- that that pattern of change would be what we would expect if these contributors were investing their resources in something that -- some service that was provided to them by the office holders. And like many economic analyses backs out the effects of the money on the behavior by looking at how the contributions change as the power of the legislators change.

Q. But neither of those studies correlates **[*61]** increases in contribution to different legislative behavior, voting, or allocation of time by the member, true?

A. True. It is looking in some sense at the imputed value of all the things that members might provide.

Again including legislative effort, legislative access, legislative votes, legislative oversight and saying the sum total of all of those services provided can be inferred from the way in way contributions change as the institutional power of the members changes.

Q. But you're saying inferred, they are inferring that the conduct of the member may change simply because more money is following that member as his status in Congress changes, right?

A. Yes.

Q. They have not examined the other end of the coin of whether the member's activities actually do change, correct?

A. Well presumably if you were on the banking committee and you are no longer on the banking committee, your behavior has changed. You can't cast votes on the banking committee.

* * *

[*69] Q. Did you see there as independent variables, any variable or any proxy for amount of lobbying efforts spent by the PAC being studied?

A. As an independent variable?

Q. As an independent variable.

A. No.

Q. And indeed, if one were trying to find out how much effort a legislator put into a particular piece of

legislation, it would be critically important, wouldn't it, Dr. Green, to know how much money that industry spent on case treat lobbyists to get the attention of that legislator?

MR. PHILLIPS: Would you read that back?

THE REPORTER: "Question: And indeed, if one were trying to find out how much effort a legislator put into a particular piece of legislation, it would be critically important, wouldn't it, Dr. Green, to know how much money that industry spent on case treat lobbyists to get the attention of that legislator".

THE WITNESS: Could you do it one more time?

BY MR. BURCHFIELD:

Q. Sure. To have a study that it evaluates **[*70]** the amount of -- that it tries to trace the -- let me start again.

A study that tries to trace the causes of a legislator's allocation of time to particular legislation should consider the amount of lobbying effort put into that legislation and that legislator by the industry group, true?

A. The point -- the problem that you're pointing to is sometimes a problem of collinearity, that there are two variables here, the amount of money that the PAC contributes and the amount of lobbying effort that they invest and those two things could be correlated. And what you're suggesting is that maybe it's not the money that's really causing this relationship between money and legislative effort. Maybe the correlation between money and legislative effort is a spurious manifestation on the amount of lobbying activity that these dairy interests are engaging in, independent of the money that they are spending and the answer is yes, that's possible. Although, you would think intuitively and I just don't know

the nature, the exact nature of the data that they are analyzing, that that money is really distinct from legislative effort -- lobbying effort, excuse me, but I just don't know.

[*71] Q. Well, you know that the PAC is limited to a $5,000 per election donation to a particular individual, right?

A. Yes.

Q. You also know in many industries, the dairy industry, we can go to the lobbying and disclosure act reports and find out, but they probably spend hundreds of thousand dollars on lobbyists, right?

A. Yes.

Q. They could withhold their $5,000, still spend the money on lobbyists and have the same effect on legislation as reported here, correct?

A. Correct.

Q. We just don't know from looking at this report?

A. That's correct.

MR. PHILLIPS: I'm sorry, this report is the Hall and Wayman?

MR. BURCHFIELD: The Hall and Wayman, correct.

THE WITNESS: Yes.

BY MR. BURCHFIELD:

Q. And the same would be true for the 1982 job training partnership act that is analyzed on **[*72]**table 2, true?

A. True.

Q. And the 1984 natural gas market policy act examined on table 3?

A. True.

MR. BURCHFIELD: We can take a break now.

(Recess.)

MR. BURCHFIELD: Let me ask the reporter to mark as Green cross-examination Exhibit 7 an excerpt from the Encyclopedia of the United States Congress.

(Green Exhibit No. 7 was marked for identification.)

* * *

[*142] BY MR. BURCHFIELD:

Q. Under the supremacy clause?

A. Yes.

MR. PHILLIPS: Calls for legal conclusion.

THE WITNESS: Yes.

BY MR. BURCHFIELD:

Q. Are you familiar with the Federalist Number 59?

A. Yes.

Q. And you know that it was a vigorously debated component of the Constitutional Convention as to who was going to control the election procedures at the state and federal level, don't you?

A. Yes.

Q. Because you're a student of the constitution and you're aware that that was a vigorously, maybe one of the most vigorously debated aspects of the constitutional structure, right?

MR. PHILLIPS: Object to the form of the question.

THE WITNESS: True.

MR. BURCHFIELD: Let me ask the reporter to mark the Federalist Number 59, February 22, 1788.

* * *

[*148] Q. Are you aware of any constitutional amendments to the federal election clause?

A. No, but when you think about the Tenth Amendment and the general -- it is not just a general statement about federalism, it is a very forceful statement about federalism and how that has become increasingly detached from the reality of our governmental system. You realize that our constitutional framework is both an organic outcome of accumulated policy making and the direct interpretation of the Constitution as passed.

Q. So you disagree with Hamilton in Federalist 59?

A. Well, his -- his -- what is his claim there? His claim is that the electors of his day would have regarded, in his view, that any appropriation of electoral authority on the part of the federal government as anathema, maybe that was true.

Q. But you don't think it is true now?

A. No.

Q. And indeed the Bipartisan Campaign Reform Act goes a lot farther than Hamilton indicated in Federalist Number 59?

MR. PHILLIPS: Objection, vague, **[*149]** incomprehensible, you can answer it, if you understand it.

THE WITNESS: Yes.

BY MR. BURCHFIELD:

Q. Dr. Green, I want to turn back to page 13 of your report where you say in the statement we read before: State parties influence federal elections directly even when they mobilize the supporters on behalf of a candidate for state office. And I take it that your view would be that if a state party runs an advertisement saying "Be sure to go to the polls on Tuesday and vote for Governor Davis," that that is appropriately regulable by the federal government.

A. Yes, because they are claiming -- they are asserting as far as I understand the hypothetical that you should go vote.

Q. And similarly if the state party runs an advertisement that says be sure you show up to vote on Tuesday, to vote for mayor Smith, that would be regulable?

MR. PHILLIPS: It calls for legal conclusion as did the prior question, but you can answer.

THE WITNESS: Yes, because it has that wording, be sure to get out and vote for.

* * *

[*158] BY MR. BURCHFIELD:

Q. Believe me, I'm really not in a position to answer specific questions about it, but I can ask some. Dr. Green, you've never seen a plan like this before, have you?

A. No, I have actually.

Q. Where?

A. Well, for example, I've seen plans like this, in the case of Michigan for example, the Michigan Democratic plan, I've seen that. I've seen the NAACP National Voter Fund's plan, it is not very different in the layout.

Q. The NAACP National Voter plan is not that much different?

A. It follows the same format of kind of a -- some vacant language up front on voter turnout and then the context of the election and then a series of budget items principally consisting of paid phone calls and direct mail. And that's what this budget is about.

[SOME EXHIBITS OMITTED]

* * *

[*365]FOR IMMEDIATE RELEASE

CRM

FRIDAY, APRIL 20, 2001

(202) 616-2777

WWW.USDOJ.GOV

TDD (202) 514-1888

THAI BUSINESSWOMEN SENTENCED ON CAMPAIGN FINANCING CHARGES

WASHINGTON, D.C. -- Pauline Kanchanalak, a Thai national, and her sister-in-law, Duangnet Kronenberg, were sentenced today to campaign financing-related charges in U.S. District Court in Washington, D.C. before Judge Paul L. Friedman. In June 2000, Kanchanalak pled guilty to felony conspiracy and misdemeanor campaign financing charges and Kronenberg pled guilty to one count of making an illegal $10,000 corporate political contribution to the Democratic National Committee's (DNC) federal account.

Kanchanalak was sentenced to three years probation, six months of home confinement with electronic monitoring, a $3,000 fine, and 200 hours of community service. Kronenberg received 18 months of probation and a $1,500 fine.

Between 1992 and 1996, Kanchanalak, 50, and her co-conspirators funneled approximately $690,000 of illegal foreign and/or corporate contributions to the DNC and other Democratic campaign committees. Kanchanalak used bank accounts held in the names of her sister-in-law, Duagnet

Kronenberg, and her mother-in-law, Praitun Kanchanalak, to make illegal contributions.

In determining Kanchanalak's sentence, Judge Friedman found that the sentencing calculations under federal guidelines should be increased because she was the organizer of the conspiracy and obstructed justice in the course of the investigation into her activities.

Pauline Kanchanalak and Duangnet Kronenberg are two of 26 individuals and two corporations charged by the Campaign Financing Taskforce, which was established four years ago by Attorney General Janet Reno to investigate allegations of campaign financing abuses in the 1996 election cycle.

In January 2001, James Tjahaja Riady paid a record $8.6 million in criminal fines and pled guilty to a felony charge of conspiring to defraud the United States by unlawfully reimbursing campaign donors with foreign corporate funds in violation of federal election law. In addition, LippoBank California, a California state-chartered bank affiliated with [*366] Lippo Group, will pled guilty to 86 misdemeanor counts charging its agents, Riady and John Huang, with making illegal foreign campaign contributions from 1988 through 1994.

On June 6, 2000, Audrey Yu, an employee of David Chang, pled guilty in U.S. District Court in Newark, N.J., to conspiring to obstruct justice by providing a false document to a federal district court during the grand jury's investigation into campaign financing violations in New Jersey.

On June 2, 2000, David Chang pled guilty to charges that as a principal of Nikko Enterprises, Bright & Bright Corporation, Panacom Inc., and Hudson Terrace Realty Management Corporation, he conspired to funnel illegal

campaign contributions to Senator Robert Torricelli's 1996 campaign. Chang also pled guilty to four substantive violations of the FECA for his role in funneling illegal campaign contributions in others names. Chang further pled guilty to corruptly attempting to persuade a potential grand jury witness to give false statements related to a financial transaction which was material to the grand jury investigation. Chang's sentencing date has been set for September 7, 2000.

On June 1, 2000, Cha-Kuek Koo, a Korean national residing in New Jersey, pled guilty to violating federal election law by making illegal contributions to Senator Torricelli's campaign. Koo admitted to assisting David Chang in making conduit contributions using Koo's employees at LG Group, Executive Office of the Americas. Koo's sentencing has also been set for September 7, 2000.

On April 5, 2000, a federal grand jury indicted two Buddhist nuns, Venerables Yi Chu and Man Ho, with contempt of court for failing to appear as witnesses in the government's criminal trial against Maria Hsia. Yi Chu and Man Ho remain fugitives.

On March 2, 2000, Maria Hsia was convicted in federal district court in Washington, D.C., on charges of causing false statements to be submitted to the FEC. The trial had been postponed pending an appeal of a ruling by the U.S. District Court in Washington, D.C., which had dismissed some of the false statement counts. In May 1999, the U.S. Court of Appeals in Washington, D.C. overturned the ruling and reinstated those counts. The task force dismissed a second indictment on tax charges after a jury in Los Angeles failed to reach a verdict. Hsia awaits sentencing in September.

On December 17, 1999, Yogesh Gandhi was sentenced to one year in prison for mail fraud, tax evasion, and violating

federal election laws by aiding and abetting the making of a political campaign contribution by a foreign national.

On November 1, 1999, Yah Lin "Charlie" Trie, a Little Rock, Arkansas businessman, was sentenced, after pleading guilty, to a two-count information filed in Little Rock, Arkansas, to three years probation, four months home detention, 200 hours of community service, and a $5,000 fine for violating federal campaign finance laws by making political contributions in someone else's name and by causinga false statement to be made the FEC. Antonio Pan was also indicted with Trie in the District of Columbia, but has not yet been prosecuted because he has remained outside the United States.

On September 15, 1999, Lawrence Penna, the former President of a now-**[*367]**defunct New Jersey securities firm, was charged with violating election laws by funneling illegal campaign contributions to the 1996 federal election campaigns of President Clinton and Senator Torricelli. Penna's case was transferred by agreement to the Southern District of New York, where charges relating to his violation of United States' securities laws were pending.

On August 16, 1999, a federal judge sentenced Robert S. Lee to three years of probation and 250 hours of community service for aiding and abetting the making of an illegal foreign campaign contribution to the Democratic National Committee.

On August 12, 1999, former Lippo Executive John Huang pleaded guilty to a felony charge, filed in U.S. District Court in Los Angeles, that he conspired with other employees of the Indonesia-based Lippo Group to make campaign contributions and reimburse employees with corporate funds or with funds from Indonesia. He was sentenced to one year of probation, 500 hours of community service, a $10,000 fine

and directed by the judge to continue cooperating with the investigation as a condition of his probation.

In June 1999, Berek Don, former GOP party leader in Bergen County, NJ, pled guilty to another conduit contribution scheme to the Senator Torricelli Campaign. Don awaits sentencing. On December 1, 1999, Carmine Alampi, a Bergen County New Jersey attorney, pleaded guilty to the same scheme. He awaits sentencing.

On March 23, 1999, Juan C. Ortiz, the Chief Financial Officer of Future Tech International, Inc., was sentenced to two years probation, $20,000 in fines, and 200 hours in community service for acting as a conduit for an illegal campaign contribution and participating in the reimbursement of eight other conduit contributions.

On December 14, 1998, Johnny Chung was sentenced to probation and 3,000 hours of community service for bank fraud, tax evasion and two misdemeanor counts of conspiring to violate election law.

On November 24, 1998, Howard Glicken, a fund-raiser for the Democratic party, was sentenced to 18 months probation, an $80,000 fine, and ordered to perform 500 hours of community service for violating campaign finance laws.

On November 4, 1998, Franklin Haney was indicted on more than 40 counts, including among others, conspiring with another to defraud the United States by impairing and impeding the FEC and conspiring to violate specific provisions of federal election law. He was acquitted of all charges on June 30, 1999.

On September 30, 1998, Democratic fund-raiser Mark B. Jimenez was indicted in Washington, D.C. on 17 counts of

organizing, making and concealing illegal conduit contributions to a number of Democratic campaigns, including the Torricelli Campaign. In December 1998, Future Tech International, Jimenez's Miami based computer sales company, pleaded guilty to tax offenses resulting from its illegal deduction of a $100,000 contribution to the DNC and employee campaign contributions reimbursed through the company's payroll. On April, 15, 1999, Jimenez, who is now in the Philippines, was indicted in Miami on additional charges of tax evasion and fraud. The task force is pursuing Jimenez's extradition from **[*368]** the Philippines.

In 1997, the Task Force obtained guilty pleas from Democratic fund-raisers Nora and Gene Lum, and their daughter Trisha, and Michael Brown for illegal fund-raising activities after their cases were referred from Independent Counsel Daniel Pearson. In August 1998, Gene Lum pleaded guilty to filing a false 1994 tax return and falsely preparing Nora Lum's 1994 tax return. After cooperating with the government, he was sentenced in June 1999, to two years in prison. Nora Lum was sentenced to 5 months in a halfway house, 5 months in home detention, and ordered to pay a $30,000 fine, a sentence which Gene Lum also served separate and apart from the sentence he received for his tax-related conviction. Trisha Lum and Michael Brown each received probation, a $5,000 fine, costs of more than $7,000, and were ordered to perform 150 hours of community service.

###

01-182

DEPOSITION OF PAUL SCOTT HERRNSON

Q. I don't, I only have one. I will read it to you, and then I will hand you the book and you can look at it.

A. Okay.

Q. This is from page 237 and 238. It's a fairly long passage, but I think it's worth reading, and you can take whatever time you want to look at it.

"Nevertheless, not all soft money is the same. Party soft money is used to help a large, rather than a small, group of candidates because party soft money is given to and spent by party committees, which are umbrella organizations that represent a broad range of interests. It does not create such strong policy-oriented IOUs between contributors and legislators as those created by narrowly-focused interest groups that spend soft money to help only a few candidates."

I will stop there and ask you if this remains your view so far?

[*209] A. Let me just take a quick look.

I think that would remain my view. If I was rewriting this I would say, nevertheless, not all soft money is the same. Party soft money that is used to help a large, rather than a small group of candidates, such as get-out-the-vote drives, registration, generic ads is very good, even when targeted in a few races. Party issue ads, because they skirt the law -- I would create the hierarchy we just talked about. That would be an update, but it wouldn't be a major change in my view.

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

[Caption Omitted In Printing]

DEPOSITION OF ARNOLD HIATT

September 26, 2002

* * *

[102] the most important as compared to smaller contributions or volunteer efforts for candidates?

A. Well, I think they tend to be. I think it varies if someone has a good mailing list, if a party does very well with mass mailings then it may not be as important.

Q. Mm-hmm. And based on your understanding how does that importance of hard money compare to the importance of raising soft money? Is it at least equal in your mind for the candidates and for the political process?

A. Well, I think hard money obviously accounts for infinitely more; I think it counted for four-fifths or more than four-fifths of the total amount of money spent in the last election. But on the other hand, there's less opportunity for quid pro quos or obligations to be incurred.

Q. Is it fair to say that those who are able to raise significant amounts of hard money contributions enjoy greater access than those who do not have the ability to contribute at all?

A. Certainly, yes.

* * *

[104] A. Very much so. I think it's turned off lots of voters and it's no small measure a reason of the continuous decline in voting in this country.

Q. So turning to the effects in these increases in the Bipartisan Campaign Reform Act, do you believe that you're going to be asked in the future to give the maximum to the new – to the new level –

A. Yes.

Q. – that exists? And is it your understanding that others you know who have previously given to that maximum level will also be asked to give to the maximum level?

A. Yes.

Q. What effect will that have on this disproportionate access and influence that those who give enjoy?

A. It will become even more disproportionate.

Q. I have one exhibit and then I'm done.

(Document marked as Exhibit 18 for identification.)

Q. I just want to turn your attention to the last page, which has the quote that may be highlighted. And I'll read it into the record

* * *

Deposition of Robert Hickmott
(October 23, 2002)

* * *

[9]Q. May I direct your attention, please, to. Paragraph 8, which begins on page 3 and continues on page 4. Please read the entire paragraph.

A. This is Paragraph 8 beginning on page 3? [10]

Q. Correct.

A. "As both a contributor to candidates and parties, and as a lobbyist who advises clients about political spending, I am personally aware of the fundraising practices of federal candidates. Once you've helped a federal candidate by contributing hard money to his or her campaign, you are sometimes asked to do more for the candidate by making donations of hard and/or soft money to the national party committees, the relevant state party (assuming it can accept corporate contributions), or an outside group that is planning on doing an independent expenditure or issue advertisement to help the candidate's campaign. These types of requests typically come from staff at the national party committees, the campaign staff of the candidate, the candidate's fundraising staff, or former staff members of the candidate's congressional office, but they also sometimes comes from a member of congress or his or her chief of staff (calling from somewhere other than a government office). Regardless of the precise [11] person who makes the request, these solicitations almost always involve an incumbent member of congress rather than a challenger. As a result, there are multiple avenues for a person or group that has the financial resources to assist a federal candidate financially in his or her election effort, both with hard and soft money."

Q. Okay. Now, specifically in reference to the sentence that begins at the top of page 4, "Once you've helped a federal candidate," and concludes "to help the candidate's

campaign," do you personally know, Mr. Hickmott, specific instances in which someone who "helped a federal candidate by contributing hard money to his or her campaign" was then asked to "make donations of hard and/or soft money to the national party committees or to the relevant state parties"?

A. Yes.

Q. Do you know of many such instances more that ten?

A. Yes.

Q. Would you perhaps know of upwards of 100 [12] of such instances, specific instances?

A. I'm not sure I could cite specific instances in excess of 100.

Q. If you had to estimate how many you could cite, picking a rough number, what would that number be?

A. I'm going to pull a number out of the air, 50. I mean, that's given the fact that I've been involved in fundraising for 20 some years. My guess is I could think about instances where there was correlation between hard money contributions and soft money contributions for a specific candidate then leading into soft money contributions?

Q. Let's me just finish the question just so we're precisely on the same page. A donation -- a hard or a soft money -- after there was a hard money donation to the campaign, there was then a request for a donation specifically to the national party committees or to the relevant state parties?

A. Yes.

Q. We would be here a long time today if I [13] asked you to recount each of those, approximately 50 instances, would we not?

A. Yes.

Q. I want to ask you now a different question. Do you personally know of specific instances in which someone who "helped a federal candidate by contributing hard money

to his or her campaign" was then asked by the staff at the national party committees to make a donation to an outside group that was planning on doing an independent expenditure or issue advertisement to help the candidate's campaign?

A. I can't point to any specific instance at this point.

Q. I'd like to give you some time to think about it if you think that there's another point at which you would have a recollection of a specific instance where that happened.

A. I can think of instances in which contributions were made to the federal limit for Congressman John Dingell and then there were other avenues that were not his campaign committee nor [14] were they the state party nor were they the DCCC that were -- where contributions could be directed that would be -- to be supportive of John Dingell's election.

Q. Was it staff at the national party committees specifically who asked that the contributions be so directed?

A. In that case, no.

Q. So you can think of no instance where a donation -- where it was staffed at the national party committee who asked that a subsequent donation be made to an outside group that was planning on doing an independent expenditure or issue advertisement?

A. No. But if one occurs to me before this is over, I'll bring it back.

Q. I would appreciate that. Do you know of any instance where the campaign staff of the candidate asked that such a donation be made to an outside group that was planning on doing an independent expenditure or issue advertisement to help the candidate's [15] campaign?

A. Again, I need to think about it. Nothing comes to mind right now.

Q. And if something does come to mind, you'll let me know. Do you know of any instance where the candidates fundraising staff asked that such a donation be made to such an outside group?

A. If you mean fundraising staff to also include consultants to the campaign, yes.

Q. I mean fundraising staff in the same sense that you mean it in your declaration. So please tell me whether the fundraising staff would include those consultants or not?

A. Yes, it would.

Q. And could you please tell me the specifics of that instance?

A. Again, I reference John Dingell congressional race where people who had already given the maximum amount to John Dingell's re-election were also told they could give to other entities that were supportive of John Dingell's [16] re-election.

Q. Who were those people who were told that?

A. You mean who received that --

Q. Yes.

A. I received calls like that.

Q. Do you know of any other people who received calls like that in this specific instance of John Dingell's campaign?

A. Colleagues of mine at my firm.

Q. Do you mind telling me their names?

A. Jim Free.

Q. Is he the only other colleague at your firm that received such a request?

A. That I'm aware of, yes.

Q. And what were the specific entities that you were asked to make your donations to?

A. I don't know their specific name, but it was something like the 17th Congressional District Fund. It was an entity set up in support of John Dingell's congressional re-election.

Q. Was that a PAC to the best of your [17] knowledge?

A. I don't know.

Q. Had it been in existence prior to John Dingell's campaign?

A. I don't know.

Q. Did you or Jim Free actually made a contribution to that entity?

A. I did not. I don't believe he did either.

Q. Do you know of any other instances associated with John Dingell's campaign or otherwise in which the candidate's fundraising staff, as you have defined it, asked that such a donation be made to such an outside group?

A. Not that currently comes to mind.

Q. Do you know of any instance where former staff members of the candidate's congressional office asked that such a donation be made to an outside group?

A. Not that comes to mind.

Q. Do you know of any instance where a member of Congress asked that such a donation be [18] made to such an outside group?

A. No.

Q. Do you know of any instance in which the chief of staff of a member of Congress asked that such a donation be made to such an outside group?

A. No.

Q. Is it fair to say, sitting the Dingell instance aside, that there are virtually no instances in which a contributor is asked in the context of donating to a particular campaign to then a donation to -- then asked by the campaign by the agents of the campaign to make an donation to an outside group engaging issue advocacy?

A. That I can specifically point to, no.

Q. In terms of your general experience and your best sense, is that also true?

A. That's correct.

Q. I'd like to turn now to Paragraph 9 in the declaration. You don't have to read all of this in its entirety. If you want to, please feel free.

A. Should I read it out loud or just review it myself?

[19] Q. To yourself, if you want to familiarize yourself with it.

A. Okay. Just Paragraph 9?

Q. Just Paragraph 9 and we'll move on from there. But you explain basically in Paragraph 9 that you advise your clients that they can obtain chits with members of Congress by making soft money donations that pass through individual members of Congress and the party committees. Is there comparable means by which your clients can obtain chits with members of Congress when they donate money to outside groups that are in issue advocacy?

A. My guess is that if a member of Congress were to approach a client and say, if you want to help me, you can also give money to this outside group, that would be deemed a chit.

Q. You know of no such hypothetical instance actually occurring, though, is that correct?

A. That's correct. [20]

Q. So setting that hypothetical aside, is it true in practice that your clients can obtain chits with members of Congress by donating to outside issue advocacy groups the same way that your clients can obtain chits when they make soft money donations?

A. That's my sense, yes.

Q. I think your prior declaration in the Colorado Republican case also describes a tally system that was in place at the DSCC at least the time that you worked there and that has been in place previously. Do you know if such a tally system is presently in place? Do you have a sense that it, in fact, is?

A. I believe it is. I don't know if it's still called the tally system, but I believe there is some mechanism like that.

Q. But in essence, in substance, the tally system allows the parties, Democratic and Republican to keep track of how much individual members of the party have raised in

the form of soft money [21] donations to the party; is that correct?

A. I can't speak to the Republican party.

Q. Speaking only then to the Democratic party?

A. Yes.

Q. Do you think that that tally system is frequently referenced and used in order to determine how much soft money should be spent on behalf of the particular members of the party?

A. My experience with the tally system did not involve soft money. My experience with the tally system was hard money.

Q. And with respect to hard money, how would that tally system be used?

A. It was one of the criteria used to help determine how much of the finite resources that the party committee had would be expended on behalf of a federal candidate.

Q. And there it was used in the same sense that I described with respect to soft money to basically ascertain how much hard money the member of the party had raised for the party, and the party [22] would then -- strike that -- am I correct that the party would use the tally system to make sure it spent on behalf of the particular candidate roughly the same amount that that candidate had raised for the party?

A. That's not correct.

Q. How would it be used?

A. As I said before, it is one criteria that is used to help determine how much money the party committee will spend on behalf of the candidate.

Q. So it's only one criteria among others that would go into that ultimate determination?

A. That's correct.

Q. But it will weigh in favor or against that candidate depending whether the candidate has raised more money or less money for the party?

A. It's a factor.

Q. Is it your understanding that a similar tally system is used for soft money donations?

A. I don't know.

Q. Can the tally system, as you understand [23] it, track the amount of soft money that was contributed by particular donors?

A. I don't know.

Q. Did it work that way when you were?

A. We didn't track soft money when I was there.

Q. The particular amount of hard money that came from individual donor, then?

A. The tally system tracked the amount of hard money that was raised by candidates for the DSCC.

Q. And would it also track which donors had given a particular amount of that hard money that was raised by the candidate?

A. Yes. Although we were more concerned with the aggregate amount rather than the source.

Q. Do you know of any tally system that would track amount of money that a particular member of the party raises for outside issue advocacy groups?

A. No. [24]

Q. I'd like to direct your attention to Paragraph 10. Feel free to read that to yourself if you want to familiarize yourself with you.

A. All right.

Q. Toward the bottom of that paragraph you say, "As the general election draws nearer, I also receive requests from the same types of people for soft money for issue ads or for get-out-the-vote efforts." When you say you also receive requests from the same types of people for soft money for issue ads, what types of people are you referring to, Mr. Hickmott?

A. Usually fundraising consultants for candidates, or in some cases, other lobbyists who are raising money for candidates.

Q. And when you discuss soft money issue ads, are you referring primarily to those run by the parties or to those run by outside groups?

A. Parties.

Q. Are you, in fact, referring exclusively to those soft money issue ads run by the parties as [25] opposed to by outside issue advocacy groups?

A. Yes.

Q. Do outside issue advocacy groups typically sponsor the sort of events that you're describing in this paragraph?

A. No.

Q. Do they solicit donations --

MS. SEALANDER: Objection.

THE WITNESS: Rephrase, please.

BY MR. SHAFFER:

Q. Do outside issue advocacy groups solicit donations at event of the sort that you're describing in this paragraph?

MS. SEALANDER: Objection; foundation.

THE WITNESS: Not that I'm familiar with.

BY MR. SHAFFER:

Q. I believe this paragraph referred to Exhibits B where you have attached a host of different solicitations that you have received. And I'll simply represent to you that I think they're upwards of 100 such fundraising events that are [26] described in Exhibit B. Do any of these, to your knowledge, describe events run by outside groups that are devoted to issue advocacy as opposed to events run by individual campaigns, the democratic or republican parties or PACs?

MS. SEALANDER: Objection. The documents speak for themselves.

THE WITNESS: Not that I'm aware of.

BY MR. SHAFFER:

Q. Do any of the solicitations, to the best of your knowledge, request donations to outside issue advocacy groups?

MS. SEALANDER: Objection. The documents speak for themselves.

THE WITNESS: I'm not sure I know the answer to that.

BY MR. SHAFFER:

Q. Can you recall attending such an event at which solicitations were -- strike that question. Can you recall attending such an event at which donations were solicited to outside issue [27] advocacy groups?

A. No.

Q. And do you frequently attend such?

A. I frequently attend fundraising events for federal candidates.

* * *

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

[Caption Omitted In Printing]

Washington, D.C.

Thursday, September 5, 2002
Deposition of EARL F. HILLIARD

* * *

[68] going to be anywhere else on it because their interests are so diverse to the interests of even the, maybe the average American.

Their issues are probably to 80 to 90 percent economic issues, and they are going to be against anything that they got to pay for that's going to be increased. They are going to be interested in more aid for dependent children. They are going to be interested in more aid for Title VII of the education act where they can get free lunches and free dinners for their kids in school. Those are the types of issues they have, more health care for the poor, those things.

And believe me, when you vote for them, you offend those people out there that's interested in bankers making money, interested in the bottom line for the stockholders, and to be honest with you, if you truly represent your interests in a district like mine, the interests of the people, eventually, you are going to be – money is going to kill you because you are going to elevate all those other people out there that you have the interest to protect.

Q. And in your campaigns over the years, excluding this past primary election for the moment

* * *

[86] candidates or Congressman or the elected official. That may or may not be true. He doesn't have to have access. He has money. And he can move that money around and that money can determine a whole lot of things in terms of influences on you. And an elected representative, and you can see that money move, and you know the problems you have got based on your voting for or against something.

And you know it as you vote. But if you vote the interests of the constituents, in the long run, it will not pay off. It will not pay off. Because the theory is when you vote for somebody, you vote against somebody. In our society, if you vote for the poor, you vote against someone who is powerful. If you vote against banks or any financial institution raising the amount of a checking account, you voted for the consumer. You are voting for poor. You are voting for even middle income people. But you're voting against the banker. You are voting against the Savings and Loan Association. You are voting against the credit union.

And eventually, it's going to work against your interests. Because, see, each bank has a political action committee, the bank association. And there are many bank associations, different

* * *

[88] increased contribution limits will have on the time pressures facing elected officials when raising money for the election?

A. They say that May 15th, you start working for yourself and any time betwe n January 1st and May 15th you are working for Uncl Sam. Well, let me tell you

something. The day you are elected is the day you start raising money for the next race. Under this bill, that is definitely true, because you got to have money early on so that as you vote over the two years, and you vote your interest, the interests of your district, all the people you alienate, you will have gotten early on so that they would not be able to come in and withhold money from you. But at the same time, they will be able to still raise an even greater amount of money against you.

Now, let me give you an example of what happened. I raised money and when you raise money, you spend money. But not only do you spend money but the idea is not to wait until the last six weeks to buy radio ads and TV ads. So you have these regular TV ads that are nonpolitical, but you run an ad that says you are going to have a town hall meeting in Demopolis, so you run an ad in four or five counties, TV ads, radio ads.

* * *

[90] raised 1,333,000. I bet you he raised 1,333,000 dollars in the last six weeks of the election and he had less than 10 fundraisers. They had already been preplanned and he had all of that money to spend the last two months of the election, which made a big impact. He drown out the ads of the Governor, and the candidates that were running.

Q. So under the increased contribution limits, the problem of elected officials having to spend a lot of time raising money will be worsened, in your view?

A. Yes, it will. And you really have to work. You got to work. You are going to have to really work. Now, it takes away time from your actual campaign, but it also

takes away time from your serving the district, and if you have a job, you got to take time off from the job.

What that means is that a person who is running for office, he has to be of means almost to submit his name because if he doesn't have the money, and he got to raise it, as opposed to someone who is wealthy, he really has a problem. He not only has to raise money, and campaign at the same time, but he got to feed his family, so you are taking out of the political process a person who may be the John

* * *

[95] A. Yes. "Those who give the most are the ones who have the most influence," the report says. "It is an indisputable fact of our political system that those candidates and laws favored by wealthy contributors usually prevail over those whose backers or would be backers cannot afford to give large sums."

Q. Do you agree with that statement?

A. Yes, I do. Because those people who give, they are the ones that, they are the ones that you think about every time you cast a vote. And you said now – especially on something very controversial. You think, now, who am I going to make angry by this vote. Who am I going to please. These are valid things that you think about when you vote.

(Exhibit No. 7 was marked for identification.)

BY MR. BONIFAZ:

Q. The next exhibit is a column by Bob Herbert of the New York Times dated July 19, 1998. This is a column that Bob Herbert of the New York Times wrote in

July 1998 reporting on a study in which the Joyce Foundation of Chicago had funded this study focusing on large donors and found that 95 percent of those contributors were white, 80 percent

* * *

[103] true.

Q. And what impact will the increased contribution limits have on that goal?

A. It will make the political system more of a rich man's game. The wealthier you are, the more you participate, the less you will have, the less you will participate. And it works in so many different ways, even from a perception standpoint, people don't participate because they feel that if they give a dollar, they give $10, $15, the contribution will be drown out by someone who gives $2,000. They won't even give you 5 or 15.

Q. It will make the system less equal?

A. Definitely.

Q. The next exhibit is an article from USA Today dated May 8th, 2001.

(Exhibit No. 9 was marked for identification.)

BY MR. BONIFAZ:

Q. And you are quoted in this article. It's bracketed down there, the fifth paragraph down. Do you see that?

A. Yes.

Q. Could you please read that quote into the record?

* * *

[(Craig Holman Dep. 42)] commercial was designed to influence their vote for or against a candidate or legislation or public policy.

Q. The choice the students were given, is it not, was whether or not the purpose of the ad was "to provide information about or urge action on a bill or issue or is it to generate support or opposition for a particular candidate", that was the choice they were given, correct?

A. And whether or not they are unsure and unclear and don't know.

Q. You're closely familiar with the ads that the students saw, are you not?

A. Yes.

Q. Were any of the ads in your view ones which had as their purpose both providing information about or urging action on a bill or issue and generating support or opposition for a particular candidate?

A. I do recall seeing ads that had both legislative matters that they were addressing plus they mention the name of a candidate and would appear to be trying to [(Craig Holman Dep. 43)] promote or attack the candidate.

Q. How was the student to respond to question 11 with respect to such an ad?

A. It would be their subjective choice. If they were unclear, they would then register 3 which is the unsure/unclear.

Q. Do you know why they weren't given another option to answer both?

A. No, I do not know that.

Q. Could you direct your attention to question 27 which asks, "In your judgment, is the primary focus of this ad on the personal characteristics of either candidate or on

policy matters" and there they did give the students the opportunity to say both, did they not?

A. Yes, they did.

Q. Did you ever speak with Professor Goldstein about whether the students should have been given an option in responding to question 11 of saying both?

A. No, I never did talk to him about that.

Q. Do you know what the results were

[(Craig Holman Dep. 73)]

genuine issue ad"?

A. That is what Luke wrote.

Q. Do you think this is an issue that reasonable people could disagree about?

A. Certainly. I mean when it comes to any subjective judgments such as the Q 11 question, it isn't a black and white issue I think as Luke's e-mail demonstrates.

Q. Was it in the end Professor Goldstein who decided that with respect to the 2000 study that Exhibit 13 should be treated as an electioneering ad?

A. Yes, it was Ken Goldstein's decision.

Q. Why was it his decision rather than the students who did the coding?

A. I don't know why Ken Goldstein would have made that decision. That's something you would have to ask him.

Q. Wouldn't the only circumstances be if the students had decided that it was a genuine issue ad?

A. There are occasions in which Ken overrode the student's judgment. Here in this

[(Craig Holman Dep. 77)]

particular words?

A. That is correct.

MR. ABRAMS: I'm going to mark now as Exhibit 15 an e-mail from you dated April 11, 2001 which also deals in part with Exhibit 13. You will see that attached to Exhibit 15 are copies of all the advertisements referred to in Exhibit 15.

(Plaintiff's Exhibit Holman 15, E-Mail dated April 11, 2001, marked for Identification.)

Q. Is Exhibit 15 an e-mail that you sent?

A. Yes, it is.

Q. Are the materials annexed to Exhibit 15 copies of the advertisements that are referred to in Exhibit 15?

A. Yes, they are.

Q. Focusing first on paragraph 3 in your e-mail to Jonathan Krasno you say, "The two genuine issue ads that mention a candidate in the database are ad codes 627 (KY/CFAW Call Northup) and 2862 (UT/COC Matheson Can't [(Craig Holman Dep. 78)] Decide). There is no question these are genuine issue ads that mention a candidate within 60 days." Focusing first on the advertisement relating to Congressman Northup, do you remain of the view that there is no question that that's a genuine issue ad?

A. Yes, I do.

Q. Is it at all critical of her?

A. It raises suspicions. It doesn't say that Congressman Northup did vote in favor of the foreign worker bill. It refers to a bill that is pending before Congress and makes it unclear how Northup is going to vote on this and so encourages viewers to call her and to try to influence her vote on the bill pending at congress.

Q. It does say, doesn't it, "based on her record Congresswoman Northup is likely to vote in favor" of the bill?

A. That's right.

Q. It's not a friendly ad with respect to her, is it?

A. It's not really a critical ad either. It's not something that I would label

CONFIDENTIAL-COUNSEL ONLY-PAUL R. HUARD

And I was in charge of that operation and I was the direct report to our president.

Q So do you remember a discussion in The Coalition's management committee about setting up appointments with people on Capitol Hill in whose districts ads had been run?

A I remember we discussed that.

Q What do you remember about the discussion?

A Well, I remember two things: One, I didn't like the idea; two, we had the advice of competent counsel.

MR. KIRBY: Don't tell him what the advice was, please.

THE WITNESS: Okay.

MR. KIRBY: You can tell him that having received advice you had an opinion, but don't tell him what the lawyer told you.

THE WITNESS: We were informed that as long as it occurred after the ads had run, were no longer running, that it was all right.

I don't recall -- I know I certainly never did it because I just, you know, I didn't think -- I just didn't want to do it. I didn't feel that that was necessary.

CONFIDENTIAL-COUNSEL ONLY-PAUL R. HUARD

I don't necessarily know who else in The Coalition might have done so. I just don't.

I do know it was discussed in the management committee and that we were certainly under the impression that it was legally unobjectionable.

I still didn't like the idea, and I certainly never did it personally. I'm not sure that Mr. Nichols ever did either.

BY MR. SCHWARZ:

Q Now, the "it" that you were using there was what?

A Showing a congressman a copy, you know, a tape, you know, VCR, you know, VHS tape of the ad that ran in his district some days, weeks, months before. That is what "it" meant.

Q Did the "it" also involve a conversation with the congressman?

A I'm sure it did. Unless you can communicate by mime, I assume if you are walking in

and plugging it into his VCR you are going to have some conversation with him.

Q Did the "it" include a hope that the congressman would say -- in words or substance,

CONFIDENTIAL DEPOSITION OF PAUL R. HUARD
CONDUCTED ON THURSDAY, SEPTEMBER 26, 2002

CONFIDENTIAL-COUNSEL ONLY-PAUL R. HUARD
in advance of an election or one month in advance of an election, there is always a fair amount of after-you-Alfonse-no-after-you-Gaston comity between different associations in the business community, and I'm sure there was no vote. I'm sure there was a consensus.

Those of you who don't care for the idea, we are sure we won't do it, and those of us who do care for it and feel it is legally sound and permissible will do it.

And I'm sure that is where it was left. We rarely, you know, had votes, you know, we voted four to three to send you this kit. We didn't do that.

Q Do you know who was advocating these visits should occur?

A Not specifically, no.

Q As you sit here today, do you have any recollection -- and I'm not asking for a precise number -- but of the representatives in whose districts you did run ads, what portion of them did someone in fact visit?

A I would suspect a minuscule, you know, number, 10 percent. Maybe not even that much.

Deposition of James Jeffords
(September 27, 2002)

* * *

[6 (11 PCS/NRA 84)] Q. You are one of the Senators who intervened [7 (11 PCS/NRA 84)] in this case, are you not?

A. Yes, I am.

Q. Could you tell us why you did that?

A. My concern about the electioneering practices and trying to improve the laws to help make sure that the elections are fair.

Q. Is there any particular reason why you intervened personally as opposed to allowing the Department of Justice and the Federal Election Commission to defend the constitutionality of the statute?

A. Because I've been running in elections since 1970, I guess, '60 something, whatever. And at times, I have noticed problems and became concerned that one - I know my campaigns had a barrage of ads that was very close to the election, for which I had no opportunity to respond and realized that this was a serious problem.

Q. Could you be a little more specific with us in terms of your own campaigns?

A. My own campaign?

Q. Yes. And in terms of the nature of the [8 (11 PCS/NRA 84)] barrage of ads that you told us about?

A. Yes. As best I can recollect. It was my election for the Senate. I think it was my second term. And all of a sudden near the end of the campaign, within the last couple of weeks, why, there was a tremendous barrage of very inaccurate and damaging advertising and it came as a surprise, and we had little or no time to react to it. And the polling showed that once those ads started, my rather substantial lead had diminished substantially.

Q. Do you recall the subjects of those ads?

A. A little vague at this point. But it was - Jan Backus ran the ads, I know that. But I really can't remember.

Q. Do you recall who paid for the ads?

A. Well, my opponent paid for the ads out of her campaign.

Q. So these were - these were a barrage of inaccurate and damaging ads paid for by your opponent; correct?

A. Yes. [9 (11 PCS/NRA 84)]

Q. Have you ever been in a situation as a candidate where third parties paid for ads towards the end of a campaign?

A. I don't know.

Q. One of the documents that has been provided us in this case are certain responses by you and the other sponsors of the act to interrogatories, questions -

A. Yeah.

Q. - posed by some of the Plaintiffs. And I want to put this before you and ask you one or two questions and see if, consistent with the statement that you made at the start, you do recall certain matters which are set forth in this document. I'm going to mark it first as Jeffords Exhibit 1 a copy of Senate Resolution 323, which purports to authorize Senator Jeffords and other Senators who agree to participate in this litigation to testify except concerning matters for which a privilege should be asserted and when their attendance at the Senate is necessary for the performance of their legislative duties. [10 (11 PCS/NRA 84)]

If you mark this as Jeffords Exhibit 1, please.

(Jeffords Exhibit 1 identified.)

MR. ABRAMS: And I'll mark as Jeffords Exhibit 2 a document entitled "Intervenor's responses to Madison Center Plaintiffs' first set of interrogatories."

(Jeffords Exhibit 2 identified.)

BY MR. ABRAMS:

Q. Let me pass this to you. Do you recall, Senator Jeffords, seeing this document, your - I believe your signature is about -

A. I found it.

Q. - about 4/5ths of the way through. Do you recall seeing this?

A. I can't - I signed it, so I guess the answer is yes.

Q. Could you direct your attention to page 26, please. In fact, why don't we start at page 25. Interrogatory number 25 asks certain questions of all the Intervenors, including yourself. And it asks you all to state in detail certain matters. [11 (11 PCS/NRA 85)] And your response begins at page 26, which is what I want to ask you about.

MS. BREGMAN: The response of all the Intervenors.

BY MR. ABRAMS:

Q. The response of all the Intervenors, which speaks, as I understand it, Senator, for all of you. The signature page that you looked at states, does it not, "I declare that those responses specific to me as well as the general responses are true and correct"? That's the page that I think you saw earlier.

A. Page number what?

Q. That's the one with your signature on it.

A. Yes.

Q. Why don't we go back to page 26. There's a line, which is the beginning of the third paragraph, which is what I wanted to ask you about. I will shorten it a little bit in my reading of it. But it says in substance that Intervenors are tainted with the appearance of undue influence on their judgment to the extent certain things had [12 (11 PCS/NRA 85)] happened. And the first that it says is "to the extent that they have benefitted from soft money contributions channelled through the political parties." My question to you is, have you personally benefitted from that?

A. I don't -

Q. I'm sorry?

A. I don't know.

Q. The second one says that "Intervenors are tainted with the appearance of undue influence on their judgment to the extent that they have benefitted from electioneering

communications." Do you know if you have benefitted from electioneering communications?

A. I don't know.

Q. The third says that "Intervenors are tainted with the appearance of undue influence on their judgment to the extent that they have granted access to any donor of soft money to their party or any entity which financed an electioneering communication benefitting them." [13 (11 PCS/NRA 85)] Have you so benefitted?

A. I have no memory of doing so.

Q. And the fourth is "Intervenors are tainted with the appearance of undue influence on their judgment to the extent that they have cast votes or undertaken other acts relating to any policy matter that are consistent with the preferences of any donor of soft money to their party or any entity which financed an electioneering communication benefitting them." Is that true of you? Do you know?

A. Not to my knowledge, no.

Q. And the last says "Intervenors are tainted with the appearance of undue influence on their judgment to the extent that they have acted in other ways that would violate the Bipartisan Campaign Reform Act." And do you know if you have taken actions which would violate the act?

A. Not to my knowledge.

Q. Do you recall, Senator Jeffords, if you joined with the other Intervenors, the other sponsors of the act in making a submission to the [14 (11 PCS/NRA 85)] Federal Election Commission with respect to what's referred to as "electioneering communications"?

A. I may have. But I have no immediate recollection.

Q. Do you recall if - well, let me put this in front of you.

MR. ABRAMS: I'll mark it as Jeffords Exhibit 3, a document dated August 23, 2002, address to Ms. Mai, M-a-i, Dinh, D-i-n-h, the acting assistant general counsel of the Federal Elections Commission.

(Jeffords Exhibit 3 identified.)

BY MR. ABRAMS:

Q. Could you read to yourself, Senator, just pages 1 and 2 of this document.

A. Uh-huh. Yes. I'm sorry. Do I go all the way through?

Q. No, just page 2 is all I'm going to ask you.

A. Right.

Q. And you're one of the people who signed it? [15 (11 PCS/NRA 85)]

A. Yes.

Q. And what did you mean by using the words "sham issue advertising"? What does that mean?

A. Well -

MS. BREGMAN: I'm going to object just because I'm not sure there's a foundation for the fact that he used the term or a term that this particular Senator uses. It is in the paper, which was prepared with counsel on the advice of his staff and counsel. But if he has an understanding, he can give it to you.

MR. ABRAMS: I move to strike counsel's statement of facts. I'm asking the Senator what certain language means in a document that he signed.

BY MR. ABRAMS:

Q. And the only language I'm going to ask you about is this use of the words "sham issue ads." What does that mean, Senator?

A. "Sham" means incorrect or misleading, in my mind. Probably both.

Q. What is a sham issue ad?

MS. BREGMAN: What is his understanding of [16 (11 PCS/NRA 85-86)] that term?

MR. ABRAMS: Yes.

THE WITNESS: It's that it raises an issue that is incorrect and that is misleading to the detriment of the campaign.

BY MR. ABRAMS:

Q. A false statement?

A. Basically. At least incorrect.

Q. And the words "issue ads," put aside the word "sham" for a moment, what do you understand an issue ad to be?

A. It's an issue that concerns the election and the - the parties to the election statements, or information.

Q. Are there some issue ads, to your knowledge, which deal with issues like how a Senator ought to vote on a particular piece of legislation or what approach a Senator ought to take to particular topics?

MS. BREGMAN: Again, you're asking for his use of this word?

MR. ABRAMS: Correct. [17 (11 PCS/NRA 86)]

THE WITNESS: That would be an issue ad.

BY MR. ABRAMS:

Q. I want to show you now a few documents which were prepared by an organization called the Brennan Center?

A. The what?

Q. The Brennan Center -

A. Brennan.

Q. - for Public Politics. They're amongst your lawyers in this case - I can ask you, not tell you. Are they among the lawyers representing you, do you know, in this case?

A. I don't know.

Q. Well, what they've done is put together documents which set forth the text of certain advertisements which appeared on television in the 1998 and 2000 campaigns.

A. Uh-huh.

Q. They photograph from satellites in the sky and they appear to set forth the language on the ads and pictures of the ads.

A. Uh-huh. [18 (11 PCS/NRA 86)]

Q. And I wanted to explore with you a little bit a few of those to get your own judgment as to whether they are sham issue ads.

MR. ABRAMS: Let me mark as Jeffords Exhibit 4 a document - the second line of which says "AFL/made in China Myrick," M-y-r-i-c-k.

(Jeffords Exhibit 4 identified.)

BY MR. ABRAMS:

Q. I would like to ask you to assume, Senator, that the language you see here is the language that, in fact, appeared on an advertisement paid for by the AFL/CIO.

A. I've read it.

Q. Now, for the record, I'll simply read a part of it in. This is an advertisement that reflects an announcer starting out saying the following: "Behind this label is a shameful story of political prisoners and forced labor camps, of wages as low as 13 cents an hour, of a country that routinely violates trade rules flooding our markets, draining American jobs. "Now Congress is set to scrap its annual [19 (11 PCS/NRA 86)] review of China's record and reward China with a permanent trade deal. Tell Congresswoman Myrick to vote no and keep China on probation until this label stands for fairness." Then it says "paid for by the AFL/CIO."

My question to you, Senator Jeffords, is this an example of what you would consider a sham issue ad?

MS. BREGMAN: I'm going to object just so the record is clear that this is not a term, "sham issue ad," that this witness uses in the same way or is familiar with as other Intervenors and other parties in the case might. And I am quite sure that this would be a confusing part of the transcript if we go forward.

You can certainly ask the questions. But perhaps clarify as to whether you are talking about whether this ad falls within the Snowe-Jeffords amendment or meets some definition that you have that is different than Senator Jeffords.

BY MR. ABRAMS:

Q. Let me rephrase it, Senator. [20 (11 PCS/NRA 86)] Assume with me that this ad ran within 60 days of Congresswoman Myrick's re-election day.

A. Uh-huh.

Q. I'm not telling you that that happened, but I'm asking you to assume that that happened. Would this ad be problematic, a concern to you if it were to run within 60 days of her re-election day?

MS. BREGMAN: Objection. You're asking for his personal opinion of whether it would be problematic.

THE WITNESS: Well, this is an issue is a little bit difficult. It's a complicated issue. I don't - just from what I see, I don't - I couldn't say one way or the other.

BY MR. ABRAMS:

Q. Is this, in your personal view, the sort of ad that ought not to run within 60 days of the election of, in this case, Congresswoman Myrick?

MS. BREGMAN: Where was it run?

BY MR. ABRAMS:

Q. I ask you to assume that it was run at least in her district. [21 (11 PCS/NRA 86-87)]

A. Uh-huh.

MS. BREGMAN: Can you also elaborate on what's the sort of the funding?

MR. ABRAMS: The AFL.

MS. BREGMAN: Treasury funds?

MR. ABRAMS: I don't know.

THE WITNESS: Well, there are certain prerequisites under the law that - that I got in which you can't tell from reading this whether they met or not.

BY MR. ABRAMS:

Q. What sort of things would you want to know in order to answer it?

A. Well, who paid for the ad?

Q. Why don't you - it's nice to have this discussion, Senator.

A. Treasury funds?

Q. Assume that it came from AFL treasury funds.

A. Well, then, it would meet one criteria. And when was it run? If it was within the prescribed time limits, either

30 days to primary, [22 (11 PCS/NRA 87)] 60 days to general election, then it might qualify. But is it inaccurate? Misleading? I don't know.

Q. Is it - I'm sorry, Senator?

A. So I'm not sure that it meets the disqualifications.

Q. Is it your understanding that the disqualification applies to only inaccurate or misleading information?

A. Uh-huh.

Q. You have to say "yes" or "no."

A. Yes.

Q. So an ad that appeared within 60 days that is true, to your understanding, would not be covered by the act that you and Senator Snowe drafted?

MS. BREGMAN: I think that asks for a legal conclusion. Can you repeat the question?

BY MR. ABRAMS:

Q. What I'm asking is, is it your understanding - and I understand that you aren't appearing as a lawyer.

A. Right. [23 (11 PCS/NRA 87)]

Q. Let me ask you, are you a lawyer?

A. Yes.

Q. But I'm not asking you now as a lawyer. I just want your understanding as to whether an ad that appears within 60 days of an election that mentions a Congresswoman who was running for re-election and which is true falls within your understanding of the law that you and Senator Snowe drafted?

MS. BREGMAN: I'm going to object both on speech or debate and legal conclusion. You're asking him to match the ad with the act. Is that what you're doing? The act covers what the act covers. And his personal opinion is not relevant. The words of the act say what they say. And the ad is either false within it or not.

MR. ABRAMS: You can answer it, Senator.

MS. BREGMAN: So you're asking him what his personal understanding of what the words are and whether this would fall under it?

THE WITNESS: Of course within the time limits and if the funds came from treasury, then it [24 (11 PCS/NRA 87)] could fall within.

BY MR. ABRAMS:

Q. And my next question to you is, as you sit here today, do you think - do you, Senator Jeffords - think that an advertisement which does appear within 60 days of an election, which does mention the name of a Congresswoman who is running for re-election, and which says that she should vote a certain way on a piece of legislation should fall within the realm of the statute that you and Senator Snowe drafted?

A. Well, "fall within the realm," I say yes. But that doesn't mean that it's in violation of the act or not.

Q. Why is that?

MS. BREGMAN: Objection. Whether something is in violation of the act or not clearly calls for a legal conclusion under the act. And this witness is not a legal scholar that has studied the act in order to answer such questions. It either falls within the act or it doesn't. [25 (11 PCS/NRA 87)]

MR. ABRAMS: Now -

MS. BREGMAN: And his personal opinion is irrelevant, or at least I think the witness should have an opportunity to read the words of the act.

BY MR. ABRAMS:

Q. I want to be clear, Senator, I'm not interested now whether it falls within the act. I'm interested in your views, as you sit here answering questions to me, as to whether an ad like this should be subject to the provisions of the law that you and Senator Snowe drafted, if that is what it says.

MS. BREGMAN: I'm going to have to object. I don't understand the question at all. Whether it should be subject to the law if it is or if it isn't, I guess that would call for speech or debate information. What led up to the act and what was determined to be covered by it is in the legislative record.

MR. ABRAMS: I'm not asking for what led up to the act or what's covered by it. I'm asking for Senator Jeffords' view as to whether this [26 (11 PCS/NRA 87-88)] particular ad, in his view, as he sits here today -

THE WITNESS: It could fall within the act from my understanding. But it depends on the law and other aspects as to whether it's accurate or all those kinds of things. Certainly if it's something which is put on by treasury funds, within those timeframes and it proves to be inaccurate and misleading, I say it's within.

BY MR. ABRAMS:

Q. I'm going to show you now, Senator Jeffords, a tape that we made up at my law firm of certain advertisements that were shown at different times by the AFL/CIO and the United States Chamber of Commerce. And I wanted to ask you first just to watch the tape. There are going to be seven ads on it. And after you watch it, I'll ask you a few questions about it.

MR. ABRAMS: I'm gong to mark the tape as Exhibit 5.

(Jeffords Exhibit 5 identified.)

(Jeffords Exhibit 5 video played.) [27 (11 PCS/NRA 88)]

BY MR. ABRAMS:

Q. Now you've just seen this exhibit, as I mentioned to you, contains seven separate advertisements and I would like to ask you a few questions about that. The first two advertisements paid for by the United States Chamber of Commerce refer to a Congressman Longley. Do you recall that?

A. Uh-huh.

Q. You have to say yes or no for the record.

A. Yes.

Q. I want you to assume with me for the moment that they were run within 60 days of an election that Congressman Longley was running in. And what I want to ask you is this, in your view, in light of the problems that you perceived to exist before the adoption of the Bipartisan

Campaign Reform Act, and before the adoption specifically of the legislation you and Senator Snowe drafted, were these two ads which refer to Congressman Longley the sort of things that you believed ought to be in some way limited with respect to the ability of the Chamber of Commerce to pay for it? [28 (11 PCS/NRA 88)]

MS. BREGMAN: Objection, speech and debate. What he considered and what his views are that led to the enactment of the legislation are protected and privileged. And I instruct the witness not to answer that question.

BY MR. ABRAMS:

Q. As you look at these ads that mentioned Longley now, are they what you consider to be sham issue ads?

MS. BREGMAN: Objection. That is not a term that this witness uses or was familiar with.

MR. ABRAMS: You keep telling me that, but you are not a witness.

MS. BREGMAN: I understand that.

BY MR. ABRAMS:

Q. Senator.

A. Well, I go by my counsel here. I don't know.

Q. The third ad refers to the Kennedy-McCain Bill. As you sit here now, does the reference to the name of Senator Kennedy or Senator McCain in that advertisement, if those ads had been shown in [29 (11 PCS/NRA 88)] either Massachusetts or Arizona prior to their election within 60 days, seem to you to be phony ads?

MS. BREGMAN: Objection. I'm not sure what "phony ads" are. If you have an understanding of the term, you can answer.

BY MR. ABRAMS:

Q. Let me rephrase it then in the language used in the letter signed by you. Does the reference to those names, as you sit here, seem to you to be sham issue ads?

MS. BREGMAN: Same objection as before, but you can answer your question using your understanding of the term, if any.

THE WITNESS: It could be. It depends upon the accuracy and circumstances.

BY MR. ABRAMS:

Q. What would you have to know, do you think, in order to be able to answer that question?

A. Well, you have to have adequate knowledge of the issues that are there which are, some, very complicated, and give you an opinion.

* * *

[75 (11 PCS/NRA 89)] Q. Have you, let's make it - have you ever been the subject of ads paid for by I'll say "outside groups," by that I mean nonparty groups or not your opponent in an election, which have criticized you in any way?

A. Yes.

Q. Did you seek to respond to those criticisms?

A. If I felt response was appropriate or needed, but normally I ignore them.

Q. I'm sorry?

A. Normally I would ignore them, unless I had a close election or something and felt compelled to do something.

Q. Can you recall an instance where you did seek to respond to criticisms by outside groups that [76 (11 PCS/NRA 89-90)] were aired in advertisements?

A. I'm sorry.

Q. Can you think of an instance where you did respond to advertisements by outside groups that have criticized you?

A. No. I don't believe so. Because I don't think when that occurred we had time to do so. That's the purpose of passing this law.

Q. Okay. When you say you didn't have time to do so, how would that have worked as a practical matter?

A. Well, first of all, can you buy space, that's the critical problem usually. And if they're run and you can't respond, which is one of the big purposes of our law, then you're defenseless.

Q. And how does that work, in your experience in Vermont? And I'm just - do you buy your - do you buy your advertisements in advance and try and get time in the period before the election?

A. It depends upon how much money you have obviously. But you try to buy your ads so that they will be within, you know, the closeness to the [77 (11 PCS/NRA 90)] election that they're affected. And if you find yourself you can't do that, it's a big disadvantage.

Q. And I'm just trying to get the practicalities of why you couldn't do it. Because you wouldn't necessarily have enough money or maybe all the slots have been filled?

A. All the slots have been filled.

Q. So even if you did have the money you might not be able to get air time to run?

A. Right.

* * *

DEPOSITION OF SENATOR JAMES JEFFORDS

Q. And again, just so we're clear, I know the last page says "vote for Bart Peterson," who was the mayoral candidate and the Democratic team for city council. And it lists various names, and it encourages people to vote on Tuesday, November 2nd. I'll represent to you that's a date when federal candidates were on the ballot. And again the Indiana Democratic Party paid for this with soft money.

Does this handout urging people to vote in local elections paid for by a state party with soft money, in your mind, raise an appearance of corruption for federal candidates or officeholders who appeared on the ballot the same day?

MS. BREGMAN: This is his personal --

MR. CARVIN: Yeah.

MS. BREGMAN: -- opinion sitting here looking than this. Nothing more than that.

THE WITNESS: Well, not on its surface. But again, it's not relative to -- related to the **[*84]** law that we're talking about, because that does not restrict the use of print.

BY MR. CARVIN:

Q. Yeah, and then I'm trying to get a general sense from you again with all the caveats, do you see a distinction between these kind of television, radio ads and what I would characterize as sort of generic, vote Democratic that lists candidates for state and local office that are either done in newspapers or handouts. Do you see a distinction?

MS. BREGMAN: Objection. I'm going to object because every answer that this witness is giving is

displaying the fact that he relates everything to the legislation. And that all of his views that he's given you are trying to respond in a way that sheds light on how Congress drew lines. And that is -- that is what he keeps coming back to. That is why I think the questions, as he hears them and as he responds to them, do implicate the speech and debate clause.

He's going back to telling you why certain things may have been treated within certain portions **[*85]** of the act. And I think that renders it impossible, to be asking these questions in a way that does not implicate the speech or debate clause.

BY MR. CARVIN:

Q. That's why I was thinking maybe we could switch to a more general. I've given you certain illustrative examples. Again, without referring to the act or legislative history, just as somebody who knows the political process and has been involved, do you perceive a difference between the potential appearance of corrupting or -- corrupting effect of these radio ads or television ads and these efforts in print or in mailings to encourage people to get out to vote on an election day?

A. Yes.

Q. And --

A. That's why we handle them differently.

MS. BREGMAN: We keep coming back to the legislation. I don't think that this witness has a view that can be separated from his view as a legislator.

* * *

Q. For the Senatorial committee. Can you recall how many hours you might do in an election year for the Congressional committee when you were a Republican Congressman?

A. It was about the same.

Q. And I can go through all the questions. But in terms of your attendance at these fund-raising dinners and the conversations you had with people there, was the experience at the House fund-raisers essentially the same as you described with the Senate fund-raisers?

A. Yes.

Q. Okay. Did any of the party leadership that you've been involved with suggest or imply that preferential access should be given to large money -- large soft money donors to the national party committee?

MS. BREGMAN: Do they suggest it to him?

MR. CARVIN: Yeah.

MS. BREGMAN: To you personally. Do you **[*107]** recall?

THE WITNESS: I don't recall any.

BY MR. CARVIN:

Q. Have you ever heard of a conversation between a leader of one of the national party committees and any representative, Senator or Congressman, where it was implied or suggested that the federal officeholder should give preferential treatment or access to large soft money donors?

A. I don't have any recollection.

Q. Okay. Do you know any representative or Senator who has ever altered their vote in any way because of, in part, soft money donations?

A. No, I don't believe so.

Q. Okay. My questions up to this point have been about the national parties.

A. Yes. Uh-huh.

Q. And we chatted about this a little bit earlier. I'm not entirely clear. Did you do fund-raising for the Vermont Republican Party at any point?

A. Yes.

CONFIDENTIAL DEPOSITION OF BRUCE JOSTEN CONDUCTED ON WEDNESDAY, SEPTEMBER 11, 2002

CONFIDENTIAL – BRUCE JOSTEN

A Well, I remember a meeting that I was in the for The Coalition management committee that discussed after the ads had been up and run and down off the air because there was a lot of interest, as I am sure you are aware, on what we were or weren't doing all over town, and some people, I believe, wanted to after the fact discuss that.

I did not attend any meeting to do that that is referenced here, so ...

Q So you are saying -- assuming the meeting happened as Mr. Nichols said it did, you are testifying you know you were not at it?

A I know you I was at none of these meetings.

Q You were at none of the meetings of the coalition's management committee?

A No, I was at none of the meetings on Mr. Nichols' memorandum.

Q Let me restate my question.

Do you have any reason to doubt there was a discussion in The Coalition's management committee about setting appointments on Capitol Hill?

A I have no reason to dispute that.

CONFIDENTIAL DEPOSITION OF BRUCE JOSTEN CONDUCTED ON WEDNESDAY, SEPTEMBER 11, 2002

CONFIDENTIAL – BRUCE JOSTEN

Q Now, the four congressmen who are referenced in this document; do you see them? Chambliss, Chenoweth, Hostetler and Whitfield, do you see those names?

A Yes.

Q They were all congressmen in whose districts you were running ads to rebut the AFL-CIO, correct?

A I believe so.

Q Okay.

A Did you mean this to come across?

Q I don't think so. It adds general points, but I don't think it would have revealed very much. Thank you, though.

MR. SCHWARZ: Would you mark as Josten 21 a document produced by The Coalition Bates stamp 497 and 498.

(Thereupon, Josten Exhibit No. 21 was marked for identification and was attached to the transcript.)

BY MR. SCHWARZ:

Q This was produced by The Coalition, and it specifies a number of congresspeople in the left-hand column, correct?

A Yes.

[LaPierre Deposition—Exhibit 3]

[Letterhead of the National Rifle Association of America]

March 16, 2001

Dear:

On January 20th, as I stood in the sleet and rain watching George Bush being sworn in as President, I thought about you.

I was thinking about your dedication, your hard work, your willingness to dig into your pockets and send the badly-needed funds that enabled us to stop Al Gore from winning the presidential election by the barest of margins -- and to reclaim the White House from those who for eight years spared no effort to undermine and destroy our precious freedoms.

As I watched Bill Clinton hand over the reins of power to George W. Bush, it occurred to me that you and I won this battle in precisely the same way our forefathers did -- 225 years ago. We sacrificed, we worked together as a team. We stood together bravely, side by side, even at times when victory seemed out of reach.

And in the end, we won a great victory that will be remembered alongside the most pivotal battles that have ever been won by American patriots and freedom fighters.

After the election, Bill Clinton declared on national T.V. that the NRA made this victory happen. Clearly, our efforts made a pivotal difference in Arkansas, Florida, Ohio, Tennessee, and West Virginia.

Not only in these states, but in every state, you worked hard and you changed history -- and I thank you from the bottom of my heart.

And in the face of all we accomplished we have to remember to thank two great men -- the President of the

NRA, Charlton Heston, and the President of the United States, George W. Bush. They were our leaders, and they led us well.

Yet, while nothing can ever take away from our extraordinary accomplishments together, I do need to make it clear to top NRA members like yourself that our rights are by no means safe simply because George W. Bush now sits in the Oval Office and not Al Gore.

[2]Please understand: The anti-gunners have not signed a surrender agreement. They have not laid down their arms or abandoned their sworn pledge to take away your guns and your rights.

And I'm turning to you today, as an NRA leader, for three essential favors to help maintain and strengthen our defenses against attacks on your Second Amendment rights which are sure to come in the months ahead.

First, I'm asking you to sign, stamp and mail the enclosed Postcard to the new President of the United States, George W. Bush.

*****

At the same time, please grant my second request by mailing the other card I've enclosed to NRA President Charlton Heston.

*****

[3]

*****

And now I come to the third action I need you to take which is the most difficult of all. I need you to help me right now by sending the NRA a special contribution.

Last fall, I faced what I believed - and still believe -- was a life-or-death choice for the future of the Second Amendment. I could choose to spend as much as the NRA possibly could, to get our message to gun-owning voters in critical swing states -- or I could hold funds in reserve for battles during 2001 and beyond.

I made the decision I did -- to spend every dime and dollar we could -- because I didn't want to look back after a defeat and say, "My gosh, if we had only done a little more, we could have won."

Over the years, I've listened to you and I know you always want me to do whatever it takes to win. And that's what I did. I spent what it took to defeat Al Gore, which amounted to millions more than we had on hand.

According to national polls taken after the election, an extraordinary 74% of those who oppose new gun control laws voted for Bush.

[4]There is no doubt that the money we spent got our message out, drove our supporters to the polls, and changed history.

But now we are in the middle of new battles for our guns, our hunting, our freedom, and our way of life. And I can't go forward in the fight until I get the NRA back to even from the last battle. We spent what it took to win. Al Gore is not in the White House. But we are in debt. And now I've got to dig the NRA out financially.

*****

[5]

*****

I hope you'll join me in never forgetting what we accomplished last year. It was among our finest hours against the enemies of liberty.

And I've never been prouder of you and our NRA.

Now, I hope you'll tell me I did the right thing last year by sending your special contribution to the NRA today. Our enemies are watching and I need your contribution today to keep our battle flag waving high and proud.

If you send that contribution today, you'll prove to all Americans that I did the right thing last fall when I decided to do whatever it took to save your guns.

When the chips were down, you've been there for me and the NRA again and again. I'm counting on you. Please mail your postcards and send your contribution to the NRA today in the most generous amount that you and your family can spare.

Thank you.

Sincerely,
Wayne LaPierre
Executive Vice President

P.S. I can't thank you enough for standing with me over the last several years through all my T.V. battles with Bill Clinton and his allies, through all the nasty falsehoods the national media tried to pin on you and the NRA. You were always there. You are the very best, and on your shoulders we rode together to one of the NRA's greatest victories for freedom.

Now I need you to send the most generous contribution you can so that I can get the NRA out from under the bills from this historic victory and put us back on the offense. You know me -- I'll stand toe-to-toe against them every time if you give me the chance. But I need your help again right now if I'm going to do it.

Once again,- please accept my thanks and admiration for all your hard work.

[(Arthur Lupia Dep. 17)] answers start to come out contrary to the political preferences of the scholar who is seeking the funding?

A. In what sense to you mean appropriate?

Q. You don't understand the word?

A. Well, I do, sir, but there are several senses in which one could ask me that question.

Q. Do you think it is consistent with scholarly behavior of honor and seriousness as a member of a learned profession?

A. No, that I do not.

MR. ABRAMS: I'd like to mark as Exhibit 4 the following document obtained from the Brennan Center in discovery entitled to Sean Treglia, T-r-e-g-l-i-a, from Ken Goldstein, Brennan Center documents 012093, through 012097.

(Lupia Exhibit No. 4 was marked for identification.)

BY MR. ABRAMS:

Q. Have a look at that first and tell us whether you've seen that before.

A. Again, I don't recall.

Q. Professor Goldstein testified yesterday that this was an application he made for funding in the year 2000 with respect to his work, which was incorporated in some sense in the book called Buying

CROSS-EXAMINATION OF THOMAS E. MANN

Q. Do you have any reason to believe that interest groups, recognizing the other opportunities that will remain available to them under BCRA, the ground war within 60 days of the election, will not engage in the same sort of growth in using resources there that they have used in issue advocacy?

A. No. I anticipate more, I should say yes. I anticipate more ground war activities from interest groups. I anticipate more ground activities from political parties as well.

Q. At the bottom of page 33 of your report, you say groups may use their campaign contributions in conjunction with their lobbying operations to reinforce or activate rather than convert members. They may also try to curry favor by running helpful electioneering issue advocacy campaigns for or against particular Federal candidates. Are you with me there?

A. Yes.

Q. It is your view, I take it, that some **[*149]** interest groups engage in issue advocacy for the purpose of currying favor with office holders?

A. I'm saying that is a conceivable strategy. I don't have any evidence that documents this. I'm saying this is in the context of the variety of ways in which, in which money can intersect with the policy process. It's a whole paragraph worth. And I'm saying, I listed that, and I think my language was they may also try to.

Q. And you would, well, you would agree with me, wouldn't you, that to the degree interest groups were interested in currying favor with office holders, even under BCRA, they are going to have this ground game possibility they can use to curry favor?

A. That's correct. They will, and they will be able to do broadcasts outside of the window, in many respects, like independent expenditures of hard money.

(Recess.)

* * *

[*164] Q. Let me ask the reporter to mark as our last exhibit, at least my last exhibit, Mann Exhibit 17, a transcript of a panel discussion at the National Press Club on May 17, 2001 featuring, among others, Dr. Mann.

(Mann Exhibit No. 17 was marked for identification.)

BY MR. BURCHFIELD:

Q. Dr. Mann, I just wanted to ask you about one question/answer sequence in this transcript and see if you, if it still represents your view, and unfortunately, this version is not paginated, but if you thumb through here, I can tell you just for purposes of the record, it is --

A. Does it have Mr. --

Q. It's nine pages up from the bottom. It's a question from David Broder.

A. Okay. I have a Broder question followed by Morehouse.

Q. Let me read the question, David Broder says, from The Washington Post, it was mentioned in the opening questions and alluded to a couple of times, but I'd like to hear a little more discussion about what you see as the likely

impact of this **[*165]** legislation on the balance of power between the parties as parties and the interest groups as interest groups?

A. Yes.

Q. And then three pages down is your answer.

A. Right.

Q. And in the second paragraph of your answer, you said, you are reported as saying, I think it is going to produce a tremendous shift in resources from television to ground activities, registration, mobilization, get out the vote. Yes, some of this will be by interest groups, and you know something, I think that's a good thing.

A. Yes. I see that.

Q. Is that an accurate transcription of at least part of your answer there?

A. I certainly, I certainly assume so, and it's plausible that I would have said that.

Q. And it's consistent with your current view?

A. Sure.

MR. BURCHFIELD: That's all I have. Thank you, Dr. Mann. You have been extremely gracious with your time and patience.

[EXHIBITS OMITTED]

DEPOSITION OF SENATOR JOHN McCAIN

Q. Last Sunday --

A. They ruled that --

Q. I'm sorry.

A. Where they ruled that you could put a limit on the amount of contributions that were given to a political campaign. I believe in this case by state party society, as I recall.

MR. WITTEN: I think you're talking about the Shrink, Missouri case.

SENATOR McCAIN: Oh, okay. I'm sorry, yeah.

BY MR. ABRAMS:

Q. Last Sunday on Meet the Press, you referred to the Federal Election Commission as an unelected corrupt commission. What did you mean by the use of the word corrupt?

[*16] A. I mean that they have failed to carry out their constitutional responsibilities of interpreting the law as it is written, and emasculated the law.

Q. Is that your understanding of what the word corrupt means?

A. That's what the reference in which I made it.

Q. You also referred to the Commission by saying that you had, quote, never seen such corruption in an independent Commission.

A. Never have.

Q. Did you use the word corruption in the same sense that you just told us?

A. Yes, they are, they are violating their constitutional duties to make regulations that conform with the law passed by Congress.

MR. ABRAMS: I want to mark a copy of a website entitled, itsyourcountry.com, and ask you if you can identify it. I'd like to mark this as McCain Exhibit 3.

* * *

[*89] A-F-T-E-R-N-O-O-N S-E-S-S-I-O-N

(1:48 p.m.)

BY MR. ABRAMS:

Q. Senator McCain, you realize that you're still under oath, sir?

A. Yes.

Q. I asked you some questions earlier in the day about your assertion on Meet the Press about the FEC being a corrupt institution. I just want to make sure of two things about that. You're not saying that the FEC has been paid off by somebody to act in some improper fashion, are you?

A. No, I believe --

MR. WITTEN: Objection. Asked and answered.

THE WITNESS: What's that?

MR. WITTEN: I'm objecting that he asked that question before, and you've answered it. But you can go ahead and answer it.

THE WITNESS: I believe that anyone who willfully carries out their duties in direct violation and contravention of the law fits that description.

* * *

Deposition of John McCain
(September 25, 2002)

* * *

[94 (11 PCS/NRA 92)] Q...Let me mark as Exhibit 10 an advertisement of the Sierra Club referring to Senator McConnell. (Whereupon, the above-referred to document was marked as McCain Deposition Exhibit No. 10 for identification.)First, have you ever seen this, Senator McCain?

A. I have not.

Q. I ask you, for our purposes, to assume that this ad was broadcast in Arizona in January of 2000.

A. January of 2000?

Q. Yes.

A. Then, McCain-Feingold would not apply to [95 (11 PCS/NRA 92)] this ad.

Q. Well, why is that, Senator?

A. Because it's not within 30 or 60 days from the time of an election, 30 days of the primary and 60 days --

Q. Isn't it 30 days before the New Hampshire primary? At least until I tell you when it ran in January.

A. Did it run in New Hampshire?

Q. It ran in Arizona.

A. Well, then, how would it apply to the New Hampshire primary?

Q. Well, I shouldn't give testimony here today.

A. Yes, sorry.

Q. Is it your understanding that the law, as you drafted it, only applies within the particular state in which a primary is being held, with respect to a federal election for President?

MR. WITTEN: For this question and all others, the Senator is going to answer based on his own personal opinion. For speech and debate clause [96 (11 PCS/NRA 92)] reasons, he's not purporting to testify as to the intent of the entire United States Congress and the President who signed the --

MR. ABRAMS: Sure.

MR. WITTEN: If you don't mind, I won't bother saying that again.

MR. ABRAMS: Sure.

BY MR. ABRAMS:

Q. Why don't we move right ahead to the text of the ad, Senator. I simply ask you to assume that an ad with these words, and with pictures such as you've seen --

A. Let me just point out if it was in January of -- what year?

Q. Of 2000.

A. Then, it would be 60 days prior to the primary, because the primary in Arizona was in March, so it did -- it is -- it does fall under McCain-Feingold.

Q. Why don't we assume --

A. We had a March primary in the --

Q. Well, why don't we just assume for our [97 (11 PCS/NRA 92)] purposes --

MR. WITTEN: Thirty days for a primary.

THE WITNESS: Thirty days for a Presidential primary. Okay. Anyway --

BY MR. ABRAMS:

Q. Right. Well, why don't we just assume for our purposes now that this ad ran, that it ran in Arizona, that it had these words, and then at least it ran during your Presidential bid in 2000, and put aside for the moment what the new statute says. I want to understand how I can tell a sham issue ad from a non-sham issue ad. As you look at this, and simply accepting my representation that it ran in January of 2000, does this read to you as a sham issue ad?

A. Yes.

Q. And please tell me why.

A. Because it meets the objective criteria of mentioning my name or showing my likeness.

Q. Well, I'd like to take you back to the time period before we had the Bipartisan Campaign Reform Act, right? So I want to ask you not whether it would violate the statute. [98 (11 PCS/NRA 92)]

A. I see.

Q. I want to ask you if, in your personal view, this is the sort of ad that you would consider to be a sham issue ad.

A. Well, if we want to have a philosophical discussion that has nothing to do with the law, I would be glad to do that, although I'm not sure how that helps the Supreme Court decide the constitutionality of the law. Of course, I think it's an attack ad, because I don't think I attacked the President's plans to protect our national forests and to create the Grand Canyon. But, frankly, I think that's irrelevant because we passed a law, so that we wouldn't have to make subjective judgments, so we would have an objective set of criteria.

Q. But the question in this case --

A. Yes.

Q. -- is whether the law is constitutional, and we want to furnish the courts with as much relevant information as we can about that. So you are here today. You are terribly knowledgeable. You [99 (11 PCS/NRA 92)] were, as you say, the chief sponsor, the drafter, of the law. And I want to ask you some questions --

A. Sure.

Q. -- which deal not with what the new law does, but with the underlying situation that existed before we had a law. I want to know if in -- as of January 2000, if you had seen this --

A. I did not see this.

Q. -- you would have thought that this ad is what you had called a sham issue ad.

A. I probably would, because of, you know, so why is he attacking the President's plans to protect our national forests and to create the Grand Canyon. The Grand Canyon was created --

Q. The Grand Canyon National Monument.

A. Oh. Well, create the Grand Canyon National Monument. I don't think I "attacked" the President's position on that. But I -- I want to add, in the strongest terms, when we're talking about constitutionality or non-constitutionality, or

what's a sham ad or what's not a sham ad, Senator Feingold and I were looking at the real world. [100 (11 PCS/NRA 92-93)] The real world is that the overwhelming majority of ads that we see running today are attack ads that are called issue ads, which are direct, blatant attacks on the candidates. The airwaves in South Dakota today cannot turn on a television set without seeing an attack ad against either John Koon or Tim Johnson. We don't think that's right. And the reason why we passed this law is not because there may be an exception or two that there's question about. But we talked to people like Congressman Adam Schiff, who said, "I used to come home in the evening and turn on the television to see which attack ads was being on my behalf and was running against me -- attack ads were being against me today."

Candidate after candidate has said, "We lost control of our campaigns." Republican National Committee buys these ads. The Sierra Club, whoever they are, they buy these ads attacking my opponent, supporting me, or vice versa.

And that's what we're trying to take care of. We're not too worried about the occasional ad [101 (11 PCS/NRA 93)] that there may be some question about, many of which you will show me.

Q. Are you worried about --

A. Because we're talking about political -- what has happened to American politics because of this fountain of soft money, which is now financing these attack ads.

* * *

[121 (11 PCS/NRA 94)] Q. The next ad, Exhibit 14, I really can't represent to you who put it on, but I'd like you to have a look at it.

A. All right.

Q. Now, assuming that this ad was put on in Nevada in the last 60 days of the Senatorial campaign involving Harry Reid and John Ensign in 1998, would you have considered this

ad to be a sham issue ad, before there was any Bipartisan Campaign Reform Act? [122 (11 PCS/NRA 94)]

A. Sure.

Q. Who does it favor?

A. It attacks both, thereby perhaps having the effect of diminishing voter turnout. It's part of a campaign.

Q. But isn't it part of a campaign, as you read it, about an issue?

A. No, it's part of -- if it's a part -- about an issue, then they should stick with the issue.

Q. Why shouldn't they be fully permitted -- let me finish the question. Let me start again. Why shouldn't whatever group put this on that was saying, "Call Harry Reid and John Ensign and tell them no matter who goes to Washington, you want them to cut your taxes; otherwise, there will be "nothing left but the crumbs," why, in your view, Senator McCain, shouldn't a group be absolutely free to put an ad on this -- saying this on any time, however it's done?

A. Could I say, for starters it said -- ran, "Democratic State Central Committee"--

Q. I know.

A. -- at the top. What's that about? Who [123 (11 PCS/NRA 94)] did sponsor this? I think it's important to know. If the Democrats sponsored it, maybe there's something we don't know about that's going on in the State of Nevada at this time. I can't make a judgment when I'm just shown an ad without knowing what was going on at the time, what was in part of the campaign, what was -- what was Harry Reid saying, what was John Ensign saying.

If it was put on by the Democratic State Central Committee, I doubt seriously if they are running an ad that doesn't hurt John Ensign, or they should be fired for wasting a hell of a lot of money.

So, I'm sorry, I can't comment on an ad that I don't know the circumstances that prevailed at the time. But I'm sure there was a reason to mention the candidates' names, and they

weren't associated with an issue. They were associated with candidates.

Q. And none of these factors matter, do they, under the new law?

A. Well, as I say, we set up objective criteria because we couldn't go through lists of thousands and thousands of campaign ads. [124 (11 PCS/NRA 94)]

Q. So it doesn't matter --

A. But we know what is run, and we know what's running as we speak today.

Q. So it doesn't matter under the new law who paid for the ad, correct?

MR. WITTEN: Excuse me?

THE WITNESS: It matters whether it was hard money or not.

BY MR. ABRAMS:

Q. Yes. I said what organization -- by "who paid," I mean, who put the ad on?

MR. WITTEN: Objection.

THE WITNESS: I really don't care who put the ad on --

MR. WITTEN: Excuse me.

THE WITNESS: -- as long as they use hard money.

MR. WITTEN: The form of who put the ad on does matter, of course, and you're not trying to imply that it --

BY MR. ABRAMS:

Q. It doesn't matter, does it, whether the ad [125 (11 PCS/NRA 94)] was deliberately put on at the end of a campaign?

A. I don't know of an ad that's not deliberately put on at the end of a campaign.

Q. Well, you just said, Senator McCain, a number of things you'd like to know in order to offer us an informed judgment --

A. Sure.

Q. -- about this ad.

A. Sure.

Q. Under the new law, none of those things that you'd like to know are relevant, are they?

MR. WITTEN: I object to the form of the question. He has been trying to answer questions that you have asked, which he has repeatedly told you are irrelevant for purposes of the new law. But go ahead.

THE WITNESS: I can only answer to you, I thought the premise of our conversation was that it had nothing to do with the law.

BY MR. ABRAMS:

Q. It was. It was.

A. You said it has nothing to do with the law, and then you're asking me a question, what it has [126 (11 PCS/NRA 94-95)] to do with the law. So --

Q. Senator McCain, I'm --

A. -- I'm not sure I understand.

Q. -- continuing our --

A. Okay.

Q. -- conversation by taking advantage of the fact that you have now given an answer which mentioned a lot of different things that you'd like to know in order to answer the question I asked about this particular ad in 1998.

A. But you asked me --

Q. And you told me --

A. -- to give the answer with no relation to the law.

Q. Correct. Absolutely. I asked you to give that answer without regard to anything in the new law, and you did. And now I'm asking you a new question.

A. Okay.

Q. Which is prompted by your answer. And the new question is: under the new law, the various things that you would have wanted to know to answer the last question, aren't relevant at all, are they? [127 (11 PCS/NRA 95)]

A. No. What's relevant here is what happens in American politics, as I keep going back to. And what's happening in America today as we speak is that the airwaves, both television and radio, are flooded with negative attack ads in the guise of being issue ads. Everybody knows that they are not.

Now, we can find an ad from time to time like this one that there may be some question about. What we're trying to do is stop the practices that are going on which we all know are going on. I'm not talking about some ethereal atmosphere. I'm talking about what is going on which has harmed the practice of American politics.

* * *

[(Sen. John McCain Dep. 139)]

is that it implies that Al Gore was responsible for Medicare cuts, which is a pretty damning indictment. I think if Al Gore had a chance to respond, I think that he would argue that — knowing his record, that he was responsible for increases in Medicare funding. So it alleges something that I — that I think that at least Mr. Gore would say is not true.

Q. Exhibit 18. It's an advertisement published in Kentucky by a group with a name something like Coalition — oh, here it is — by a group called Coalition for the Future American Worker. And my question is: assuming that this ad ran within 60 days of an election involving Congresswoman Northup, is this a sham issue ad?

(Whereupon, the above-referred to document was marked as McCain Deposition Exhibit No. 18 for identification.)

A. I think that Congresswoman Northup, as I remember the issue, was the increased number of visas for people who were high tech, as I remember this, is what they're calling a foreign worker bill. I think

[(Sen. John McCain Dep. 141)]

Q. But when you use language of "sham issue ad," is this the sort of ad you had in mind?

A. Actually, the kind of ads that I had in mind are the ones that we see 999 times out of 1,000 from my viewpoint, my subjective viewpoint, and that is that are just outright distortions and attacks on people's character and record, which is really what is being run now as we speak.

Q. And would it be fair to say, then, that this particular ad, even if run within 60 days of Congresswoman Northup's bid for reelection, is not what you have in mind now as a "sham issue ad"?

A. It is exactly what I have in mind as a sham issue ad, because if the unions or corporations are paying for it, then they shouldn't be. Only PAC money should be used, as the candidates are required to use, to run these ads.

Q. And is that because it is critical of Congresswoman Northup?

A. I think it misportrays her position. I don't know Congresswoman Northup very well, but I do know enough about Congresswoman Northup that she's not

* * *

[*192] Q. They could use it for door-to-door --

A. Yes.

Q. -- Get Out the Vote activity.

A. Yes.

Q. They could use --

A. All those are good things. And as I mentioned, we're not a perfect piece of legislation, but we also know what affects voters, and that's broadcast advertising. We know that that's what our history tells us, that that's what affects elections.

Q. But I thought you said a few minutes ago, Senator, that you wanted to get political parties really out of the issue ad business and back to the ground -- the grass roots type of activities.

A. I did.

Q. Are you saying that the grass roots activities are going to be less effective than the broadcast activities?

A. The grass roots activities are the fundamentals of a democratic process -- Get Out the Vote, voter registration,

the kinds of activities that **[*193]** should be the basis of political action. We are encouraging that. We are discouraging the state parties from being the conduits of soft money and all kinds of money washing back and forth, and that being their only business, which is the case today.

Q. Let's go back to my hypothetical for a moment. A Senator raises money for the NAACP, soft money, non-federally regulated money, for the NAACP. And the NAACP uses that 60 days before a federal election in which that candidate is on the ballot for direct mail or phone bank and Get Out the Vote activities.

A. Yes. That's fine.

Q. It's legal under the statute.

A. Yes.

Q. Does that have the appearance of corruption?

A. Of course not. It's the broadcast television and radio ads that we believe are what is the problem. We tried to address the problem in the campaign finance reform bill.

* * *

[*205] Our firewall when the head of the NAACP or I try to raise money for the Grand Canyon Trust -- solicit money, then that money is fenced in by the Snowe-Jeffords, 30 to 60 days prior. It cannot pour directly right into a broadcast ad campaign.

So that was a lot of the thinking that went into the prohibition of elected federal officials and a chairman of the committee holding fund raisers where they directly solicited funds.

Q. Okay. But my question is a bit different, and that is --

A. Okay.

Q. -- and that is, why are the office holders, whom the statute is intended to insulate from the influence of soft money, allowed to raise money for the NRA and the NAACP, but officials of the party, about whom I assume there is not the same concern, are not allowed to do --

MR. FRANKEL: In their official capacities.

[*206] THE WITNESS: I can only respond to you, again, that I believe that that money is prevented from going into a broadcast campaign at the crucial times of a campaign. So when I raise money for the NRA or the National Right to Life, or anybody else, then the majority of that money would be going into the activities hopefully -- Get Out the Vote, voter registration, phone banks, etcetera -- and not into the broadcast campaign, because of "Snowe-Jeffords."

BY MR. BURCHFIELD:

Q. Understand it. But why can't Mark Racicot appear with you when you walk up to a major donor and ask for a donation to the National Rifle Association?

A. I'll have to look at that. I did not -- I knew that he couldn't solicit money for the Republican National Committee from them, but I did not -- I'll have to check on the provision concerning soliciting money for outside groups.

Q. There is also a provision in the statute, Senator, that allows federal office holders and candidates to appear at fund raising events for state and local parties, those Lincoln Day dinner **[*207]** receptions, if you will. Why can't Mark Racicot appear at one of those dinners?

A. I think that Mark Racicot can appear at one of those dinners. He can't ask for money.

Q. But a federal office holder can.

A. A federal office holder can't ask for money. A federal office holder can appear, but the federal office holder cannot solicit money. And the reason why the law was crafted that way is because we don't want to prevent federal office holders or the Chairman of the RNC from appearing at events. We don't see anything wrong with that. But we don't believe that they should be soliciting funds there.

Q. Well, let me -- do you have a copy of the statute there on the table?

A. Yes. Let me see.

Q. If you don't, I've got a copy.

MR. WITTEN: We've got one, Bobby. Thank you. It's got some marks on it. Do you mind?

MR. BURCHFIELD: No, that's all right. That's fine.

MR. WITTEN: Somewhere we had --

[*208] MR. BURCHFIELD: Just so long as they're not yes and no.

(Laughter.)

MR. WITTEN: -- we had a colloquy on --

(Laughter.)

BY MR. BURCHFIELD:

Q. Senator, I am focusing on the exception --

A. Let me read to you the -- as I understand it. "Federal candidates and office holders cannot solicit soft money funds, funds that do not comply with federal contribution limits, and source prohibition for any party committee -- national, state, or local.

"This means that a federal candidate or office holder may continue to solicit hard money for party committees. A federal candidate or office holder may solicit up to $25,000 per year for national party committees from an individual. A candidate or office holder may solicit up to $15,000 per year for a national party committee from a PAC.

"A federal candidate or office holder may solicit hard money donations for state party **[*209]** committees to spend in connection with a federal election, including for voter registration and Get Out the Vote activities, up to $10,000 per year, from an individual and up to $5,000 per year from a PAC." That's the Levin -- the so-called Levin Amendment.

"In addition, a federal candidate or office holder may solicit money for a state party to spend on non-federal elections. The amount, however, will be subject to the federal limits and source prohibitions. Therefore, a federal candidate or office holder may solicit up to $10,000 a year from an individual, $5,000 a year from a PAC, for a state party's non-federal account, even if that same individual or PAC has already given a similar amount to the state party's federal or hard money," etcetera. So that's my reading of it.

MR. WITTEN: So just so it's clear, the Senator was reading from his remarks on March 20th.

BY MR. BURCHFIELD:

Q. Right. And it didn't sound like the statute. What I want -- and that's -- I don't disagree with what you just read, Senator, but I don't **[*210]** think it specifically -- it answers the specific question I was interested in.

Let me ask you to look -- this is going to be Section 323(e)(3), and I've --

A. Yes. Fund raising events, right?

Q. Right.

A. Okay.

Q. And that provision states, "Notwithstanding paragraph 1 or" -- which is the general ban on federal -- I guess the ban on federal candidates raising soft money -- "or Subsection B(2)(c), a candidate or an individual holding federal office may attend, speak, or be a featured guest at a fund raising event for a state, district, or local committee of a political party." Do you see that?

A. Yes.

Q. My question is: why does that exception relate only to federal candidates or office holders and not to political party officials?

MR. WITTEN: His views, right?

MR. BURCHFIELD: Yes, his views.

THE WITNESS: Because we believe that the **[*211]** candidate or the individual holding the office is one who obviously has a lot more individual clout.

BY MR. BURCHFIELD:

Q. But wouldn't that be a reason for the federal office holder not to be allowed to go out and raise --

A. They can -- but they can attend, speak, or be a featured guest at the fund raiser.

Q. But, again, wouldn't that be a reason why you wouldn't want a federal office holder in that situation, as opposed to a party official?

A. I think we're talking past each other here. A candidate or a federal office holder can attend, speak, be present, but not solicit funds. Okay? At a -- at any of these kinds of events. Why can't the Chairman of the RNC -- why isn't he prohibited also?

Q. Why isn't he allowed to do the same thing that a federal candidate or office holder can?

A. What, attend, speak, or be a featured guest?

Q. Correct. As I read that exception, it **[*212]** doesn't apply to federal -- to political party officials.

A. I'll have to give you an answer for the record, but I didn't know that it prohibited that person from attending.

Q. Well, under the general bar on soft money -- well, let me -- before I go there, you understand that the Federal Election Commission has interpreted this exception to allow a federal office holder to attend such a fund raising event and solicit funds.

A. And we'll be going to court.

Q. And I know you disagree with that, but that is

where the -- that is the state of the regulatory environment as we speak, correct?

A. Yes. We'll be going to court. As I said, the Federal Election Commission is acting in the most shameless and disgraceful fashion of any independent agency I have ever seen function, and they need to be abolished. We'll be trying to do that, too.

Q. Let me ask you a different question now. I'm now looking at the paragraph just above that. It's (e)(1), and let me just read you some provisions **[*213]** that -- you've got the statute there. Perhaps you could follow along.

"A candidate, individual holding federal office, agent of a candidate, or an individual holding federal office, or an entity directly or indirectly established, financed, maintained, or controlled by or acting on behalf of one or more candidates or individuals holding federal office" -- do you think you got it all?

(Laughter.)

"Shall not solicit," and then down to (b), "solicit, receive, direct, transfer, or spend funds in connection with any election, other than an election for federal office, or disburse funds in connection with such an election, unless the funds: 1) are not in excess of the amounts permitted with respect to contributions to candidates and political committees under --

A. That's hard money.

Q. -- the hard money -- right. So, in other words, you could -- you, Senator McCain, can raise money for the gubernatorial candidate in Arizona, so **[*214]** long as you do not raise money for that gubernatorial candidate in excess of $2,000 per contribution, as I understand it. Does that sound

right?

A. The next paragraph says, "Paragraph 1 does not apply to the solicitation, receipt, or spending of funds by an individual described in such paragraph who is or was also a candidate for a state or local office solely in connection with such election for state or local office, if the solicitation, receipt, or spending of funds is permitted under state law."

Q. I think that means if you decide to run for governor, you can raise money consistent with state law, as I read that. What I'm focusing on now is your fund raising activities on behalf of another person who is running for governor. And as I read this -- and if you either understand it differently or don't have a present understanding of it, just feel free to say so.

But as I read this, you can raise money for a gubernatorial candidate consistent with state law up to the federal limit of $2,000 per election.

A. I'm not sure that that is the reading, and **[*215]** maybe I can get you a -- we'll get a written response to you on that.

Q. That all is a big lead-up to this question. Where is the exception in there for a -- for the Chairman of the Republican National Committee to raise money for state gubernatorial candidates?

A. I don't see where he's prohibited.

Q. Wasn't he prohibited under Section 323(a)(1), which is a general prohibition of any agent or representative of a political party from raising any money that's not strictly regulated by federal law?

A. I'll have to get -- I'll have to get back to you on

that.

Q. You do understand that money that's raised for gubernatorial candidates goes into a state-regulated account, not a federally-regulated account, correct?

A. Yes.

Q. And so that would be soft money, right?

A. Yes.

* * *

[*223] Q. And hypothesize with me, because I do think it's true, that they spent that money in those state elections consistently -- they raised it and spent it consistently with state law. What's wrong with that?

A. It's not in keeping with the intent of the federal law. The intent of the federal law in 1974 -- the intent of the federal law in 1974 was to limit contributions to political campaigns to $1,000 per individual, etcetera, and certainly not to have corporate and union money go into these campaigns.

Could they prevent it from going into a state campaign? No. Because, like you say, it's up to the states.

Is it right? No, it's not right. That's why we're trying to set up this firewall between the money that goes -- is contributed to the Republican National Committee, the Democratic National Committee, etcetera, and the state parties.

[EXHIBITS OMITTED]